

ald M. Sullivan
Jesse T. Mountjoy
Frank Stainback
James M. Miller
Michael A. Fiorella
R. Michael Sullivan
Bryan R. Reynolds*
Tyson A. Kamuf
Mark W. Starnes
C. Ellsworth Mountjoy
John S. Wathen

*Also Licensed in Indiana

August 26, 2014

Via Federal Express

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

RECEIVED

AUG 27 2014
PUBLIC SERVICE
COMMISSION

Re: *In the Matter of: An Examination of the Application of the
Fuel Adjustment Clause of Big Rivers Electric Corporation
from November 1, 2013 through April 30, 2014*
Case No. 2014-00230

Dear Mr. Derouen:

Enclosed for filing are an original and ten copies of Big Rivers Electric Corporation's responses to the information requests contained in the appendix to the Public Service Commission's August 13, 2014, order in the above-referenced matter. I certify that on this date, a copy of this letter and a copy of the responses were served on each of the persons listed on the attached service list by first-class mail.

Sincerely,



Tyson Kamuf
Counsel for Big Rivers Electric Corporation

TAK/lm
Enclosures

cc: Billie Richert
DeAnna Speed
Service List

Telephone (270) 926-4000
Telecopier (270) 683-6694

Ann Building
PO Box 727
Owensboro, Kentucky
42302-0727

Service List
PSC Case No. 2014-00230

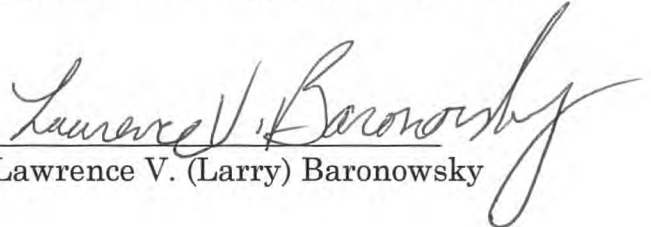
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
Attorneys at Law
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**


VERIFICATION

I, Lawrence V. (Larry) Baronowsky, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Lawrence V. (Larry) Baronowsky

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Lawrence V. (Larry)
Baronowsky on this the 22ND day of August, 2014.

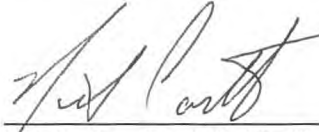

Notary Public, Ky. State at Large
My Commission Expires 03-03-2018

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

VERIFICATION

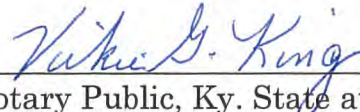
I, Nicholas R. (Nick) Castlen, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Nicholas R. (Nick) Castlen

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Nicholas R. (Nick) Castlen on this the 22ND day of August, 2014.



Notary Public, Ky. State at Large
My Commission Expires 03-03-2018

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

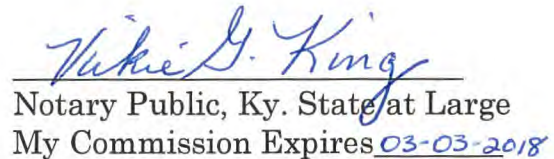
VERIFICATION

I, Murray W. (Wayne) O'Bryan, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Murray W. (Wayne) O'Bryan

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Murray W. (Wayne) O'Bryan
on this the 22ND day of August, 2014.

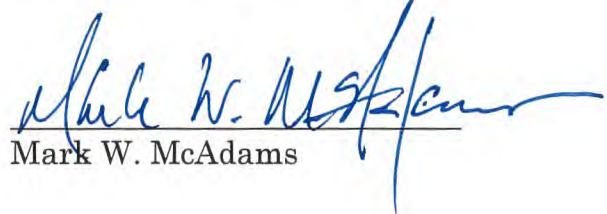

Notary Public, Ky. State at Large
My Commission Expires 03-03-2018

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

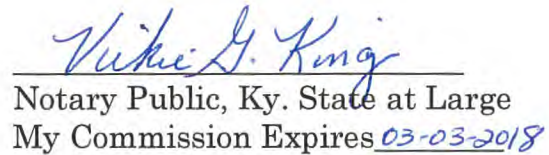
VERIFICATION

I, Mark W. McAdams, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Mark W. McAdams

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Mark W. McAdams on this the 22ND day of August, 2014.



Notary Public, Ky. State at Large
My Commission Expires 03-03-2018



RECEIVED

AUG 27 2014

PUBLIC SERVICE
COMMISSION

Your Touchstone Energy® Cooperative 

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

**AN EXAMINATION OF THE APPLICATION
OF THE FUEL ADJUSTMENT CLAUSE)
OF BIG RIVERS ELECTRIC CORPORATION) Case No. 2014-00230
FROM)
NOVEMBER 1, 2013 THROUGH APRIL 30, 2014**

**Responses to Commission Staff's Request for Information
dated
August 13, 2014**

FILED: August 27, 2014

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 1)** *For the period from November 1, 2013, through April 30, 2014,*
2 *list each vendor from whom coal was purchased and the quantities and*
3 *the nature of each purchase (i.e., spot or contract). For the period under*
4 *review in total, provide the percentage of purchases that were spot versus*
5 *contract. For contract purchases, state whether the contract has been*
6 *filed with the Commission. If no, explain why it has not been filed.*

7

8 **Response)** Please see the schedule below.

9

Purchase Vendor	Fuel Type	Purchase Tonnage	Contract Type
Alliance Coal	Coal	98,243.16	Contract
Alliance Coal	Coal	262,268.19	Spot
Armstrong Coal	Coal	310,491.98	Contract
Armstrong Coal	Coal	75,180.69	Spot
Coeclerici-Coal Network	Coal	6,220.30	Spot
ExxonMobil	Pet Coke	130,702.60	Spot
Foresight Coal Sales	Coal	112,364.45	Spot
KenAmerican Resources	Coal	356,615.89	Spot
Oxbow Carbon & Minerals	Pet Coke	24,222.28	Spot
Patriot Coal Sales	Coal	387,568.60	Contract
Peabody Coal Sales	Coal	60,844.16	Spot
Sebree Mining, LLC	Coal	525,951.29	Contract
Sebree Mining, LLC	Coal	143,146.89	Spot
TCP Pet Coke	Pet Coke	44,041.06	Spot
Winn Energy	Coal	24,719.38	Spot
Total Tonnage		2,562,580.92	
Percentage Spot Purchase Tons		48.40%	
Percentage Contract Purchase Tons		51.60%	
Percentage Total Purchase Tons		100.00%	

10

11 Big Rivers has filed its contract purchases with the Commission.

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1

2 **Witness)** Mark W. McAdams

3

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 2)** *For the period from November 1, 2013, through April 30, 2014,*
2 *list each vendor from whom natural gas was purchased for generation*
3 *and the quantities and the nature of each purchase (i.e., spot or contract).*
4 *For contract purchases, state whether the contract has been filed with the*
5 *Commission. If no, explain why it has not been filed.*

6

7 **Response)** Starting in July 2010, Big Rivers began purchasing natural gas
8 under a North American Energy Standards Board ("NAESB") base contract for
9 sale and purchase of natural gas. Actual purchases of gas are made using
10 transaction confirmations that are governed by the NAESB contract. Big Rivers
11 also entered into a contract with Texas Gas Transmission, LLC for the
12 transportation and storage and borrowing of gas to Big Rivers' delivery point, the
13 Reid Combustion Turbine. All of these contracts are on file with Commission.

14 Please see the schedule below. Big Rivers purchased natural gas
15 from Atmos Energy under Atmos' tariff-based Interruptible Sales Service (G-2) –
16 Industrial and Billing Rate Code 11 WD. This tariff is on file with the Kentucky
17 Public Service Commission. All natural gas purchased from Atmos Energy from
18 August 20, 2013, through April 30, 2014, was for the System Support Resource
19 ("SSR") Agreement with the Midcontinent Independent System Operator, Inc.
20 ("MISO") for operating the Coleman Station for Century Hawesville and no costs
21 flowed through Big Rivers' Fuel Adjustment Clause ("FAC").

22

23

24

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1

<u>Purchase Vendor</u>	<u>Fuel Type</u>	<u>MCF</u>	<u>Contract Type</u>
Atmos Energy	Natural Gas	36,574.80	Tariff based G-2 (Contract)
NJR Energy, LLC	Natural Gas	14,773.00	Spot
Southwestern Energy Services Co.	Natural Gas	13,912.00	Spot

2

3

4

Witness) Wayne O'Bryan

5

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 3)** *State whether Big Rivers engages in hedging activities for its*
2 *coal or natural gas purchases used for generation. If yes, describe the*
3 *hedging activities in detail.*

4

5 **Response)** Big Rivers does not engage in financial hedging activities regarding
6 its coal or natural gas purchases used for generation.

7

8

9 **Witnesses)** Mark W. McAdams (Coal) and
10 Wayne O'Bryan (Natural Gas)

11



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 4)** *For each generating station or unit for which a separate coal*
2 *pile is maintained, state, for the period from November 1, 2013, through*
3 *April 30, 2014, the actual amount of coal burned in tons, the actual*
4 *amount of coal deliveries in tons, the total kWh generated, and the actual*
5 *capacity factor at which the plant operated.*

6

7 **Response)** Please see the schedule on the following page. The North American
8 Electric Reliability Corporation's Generating Availability Data System defines
9 Capacity Factor as the value equal to the net MWh produced divided by the
10 product of the hours in the period times the unit rating in Net MWs, which is the
11 formula for this response.

12 Big Rivers notes that 1,601,567,000 kWhs of Coleman Generation
13 was excluded from its FAC for the period under review. The net jurisdictional
14 kWhs generated by all units during the period under review is 4,352,864,802.
15 Also, during the period under review, Big Rivers excluded 765,122.25 tons of
16 Coleman coal from its FAC. The net jurisdictional tons burned by all units, during
17 the period under review, was 2,020,364.86. The full amount of Coleman tons
18 received and burned is shown on Big Rivers' monthly Form B filings, but the burn
19 for the period under review is shown in a non-jurisdictional line and is excluded
20 from Big Rivers' monthly Form A filing.

21

22

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1

Plant	Coal & Pet Coke Burn (Tons)	Coal & Pet Coke Receipts (Tons)	Net kWh	Capacity Factor (Net MWh) / (Period Hrs x MW rating)
Reid Station (Coal)	60,777.16	63,319.38	105,793,020	37.47%
Station Two (Coal) ¹	401,875.85	360,226.20	880,021,050	86.79%
Green Station (Coal)	669,449.76	693,080.62	1,721,925,481	87.31%
Green Station (Pet Coke) ²	148,875.69	145,056.75		
Coleman Station (Coal) ³	765,122.25	641,556.90	1,601,567,000	83.22%
Wilson Station (Coal)	684,406.76	605,431.88	1,645,125,251	90.82%
Wilson Station (Pet Coke) ²	54,979.64	53,909.19		

1. Net of City of Henderson. City of Henderson generation take was 296,215,000 kWhs.
2. Net kWh and Capacity Factor include energy from burning Coal and Pet Coke.
3. Coleman Generation of 1,601,567,000kWh and Coleman burn of 765,122.25 tons were excluded from the Fuel Adjustment Clause because this station was devoted to the SSR agreement approved by MISO. The Net Jurisdictional Burn for Big Rivers during this period was 2,020,364.86 tons and net jurisdictional kWh for Big Rivers was 4,352,864,802.

2

3

4 **Witness)** Mark W. McAdams

5

6



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 5)** *List all firm power commitments for Big Rivers from November*
2 *1, 2013, through April 30, 2014, for (a) purchases and (b) sales. This list*
3 *shall identify the electric utility, the amount of commitment in MW, and*
4 *the purpose of the commitment (i.e., peaking , emergency).*

5

6 **Response)**

7

(a) Purchases:

8

Southeastern Power Administration ("SEPA"), up to 178 MW,
energy for system. A force majeure, previously declared by
SEPA for this contract due to dam safety issues at Wolf Creek
and Center Hill dams on the Cumberland System, remained in
effect from November 1, 2013, through April 30, 2014. For the
period under review, SEPA provided a run-of-the-river schedule
that Big Rivers had the right to refuse.

10

11

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16

An additional purchase is shown on the table which follows.

17

Please note, the purchase listed was made to support firm Off-

18

System Sales and was not passed through Big Rivers' FAC.

19

Big Rivers Electric Corporation			
Power Purchases			
November 1, 2013, through April 30, 2014			
Date	Electric Utility	MW Commitment	Purpose
Nov-13	Cargill	20 MWs – Off Peak - 6,880 total	Off-System Sales

20

21

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

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(b) Sales:

Firm Off-System Sales are shown on the table that follows.

Big Rivers Electric Corporation Firm Off-System Sales November 1, 2013, through April 30, 2014			
Date	Electric Utility	MW Commitment	Purpose
Nov-13	Cargill	50 MWs - 7 x 24 - 36,000 total	Off-System Sales
Dec-13	Cargill	50 MWs - 7 x 24 - 37,200 total	Off-System Sales
Jan-14	Cargill	50 MWs - 7 x 24 - 37,200 total	Off-System Sales
Jan-14	Cargill	50 MWs - 5 x 16 - 4,000 total	Off-System Sales
Feb-14	EDF	200 MWs - 7 x 24 - 134,400 total	Off-System Sales
Feb-14	EDF	200 MWs - 1 hour	Off-System Sales - Time Change
Mar-14	EDF	200 MWs - 7 x 24 - 148,600 total	Off-System Sales
Apr-14	EDF	200 MWs - 5 x 16 - 70,400 total	Off-System Sales

5
6
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8

Witness) Wayne O'Bryan

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 6)** *Provide a monthly billing summary of sales to all electric*
2 *utilities for the period November 1, 2013, through April 30, 2014.*

3

4 **Response)** Please see the attached monthly billing summaries for sales to all
5 electric utilities for the period November 1, 2013, through April 30, 2014.

6

7

8 **Witness)** Nicholas R. Castlen

9

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
November 2013**

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$
1 NOVEMBER 2013						
2						
3 JP RURALS	115,681	53,511,710	\$ 1,493,904.43	\$ 1,872,909.85	\$ 3,366,814.28	\$ -
4 KENERGY RURALS	216,352	99,145,400	\$ 2,793,969.73	\$ 3,470,089.00	\$ 6,264,058.73	\$ -
5 MEADE CO. RURALS	91,674	41,142,230	\$ 1,183,878.04	\$ 1,439,978.05	\$ 2,623,856.09	\$ -
6						
7 TOTAL RURALS	423,707	193,799,340	\$ 5,471,752.20	\$ 6,782,976.90	\$ 12,254,729.10	\$ -
8						
9 KI-ACCURIDE	5,065	1,957,770	\$ 54,271.48	\$ 58,733.10	\$ 113,004.58	\$ -
10 KI-ALCOA	161	89,130	\$ 1,725.12	\$ 2,673.90	\$ 4,399.02	\$ 1,575.11
11 KI-ALERIS	27,595	12,598,210	\$ 295,680.43	\$ 377,946.30	\$ 673,626.73	\$ -
12 KI-AMG ALUMINUM NORTH AMERICA	2,037	612,580	\$ 21,826.46	\$ 18,377.40	\$ 40,203.86	\$ 1,017.93
13 KI-ARMSTRONG - DOCK	10,357	4,211,119	\$ 110,975.26	\$ 126,333.57	\$ 237,308.83	\$ -
14 KI-ARMSTRONG - EQUALITY	3,062	1,327,933	\$ 32,809.33	\$ 39,837.99	\$ 72,647.32	\$ -
15 KI-ARMSTRONG - LEWIS	3,500	958,336	\$ 37,502.50	\$ 28,750.08	\$ 66,252.58	\$ -
16 KI-ARMSTRONG - MIDWAY	5,065	2,533,920	\$ 54,271.48	\$ 76,017.60	\$ 130,289.08	\$ -
17 KI-DOMTAR PAPER CO.	15,000	10,762,442	\$ 160,725.00	\$ 322,873.26	\$ 483,598.26	\$ -
18 KI-DOTIKI #3	161	56,180	\$ 1,725.12	\$ 1,685.40	\$ 3,410.52	\$ 128.58
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	750	409,100	\$ 8,036.25	\$ 12,273.00	\$ 20,309.25	\$ -
20 KI-HOPKINS CO. COAL	107	46,200	\$ 1,146.51	\$ 1,386.00	\$ 2,532.51	\$ 10.72
21 KI-KIMBERLY-CLARK	37,627	25,899,570	\$ 403,173.31	\$ 776,987.10	\$ 1,180,160.41	\$ -
22 KI-PATRIOT COAL, LP	0	0	\$ -	\$ -	\$ -	\$ -
23 KI-PENNYRILE ENERGY, LLC	3,000	220,920	\$ 32,145.00	\$ 6,627.60	\$ 38,772.60	\$ -
24 KI-PRECOAT	3,606	1,307,310	\$ 38,638.29	\$ 39,219.30	\$ 77,857.59	\$ -
25 KI-SEBREE MINING-KMMC	132	56,380	\$ 1,414.38	\$ 1,691.40	\$ 3,105.78	\$ -
26 KI-SEBREE MINING-STEAMPORT-ALLIED	6,937	2,698,320	\$ 74,329.96	\$ 80,949.60	\$ 155,279.56	\$ -
27 KI-SOUTHWIRE CO.	7,242	4,023,880	\$ 77,598.03	\$ 120,716.40	\$ 198,314.43	\$ -
28 KI-TYSON FOODS	10,433	5,344,930	\$ 111,789.60	\$ 160,347.90	\$ 272,137.50	\$ -
29 KI-VALLEY GRAIN	2,517	1,119,810	\$ 26,969.66	\$ 33,594.30	\$ 60,563.96	\$ 3,375.23
30						
31 SUBTOTAL INDUSTRIALS	144,354	76,234,040	\$ 1,546,753.17	\$ 2,287,021.20	\$ 3,833,774.37	\$ 6,107.57
32						
33 JPI-SHELL OIL	1,922	443,820	\$ 20,594.23	\$ 13,314.60	\$ 33,908.83	\$ -
34						
35 TOTAL INDUSTRIALS	146,276	76,677,860	\$ 1,567,347.40	\$ 2,300,335.80	\$ 3,867,683.20	\$ 6,107.57
36						
37						
38 GRAND TOTAL	569,983	270,477,200	\$ 7,039,099.60	\$ 9,083,312.70	\$ 16,122,412.30	\$ 6,107.57

**Big Rivers Electric Corporation
 Monthly Billing Summary
 Sales to Electric Utilities
 November 2013**

	BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FUEL ADJUSTMENT CLAUSE \$	FAC MILLS/ KWH
1 NOVEMBER 2013						
2						
3 JP RURALS	\$ -	\$ 3,366,814.28	\$ 10.00	\$ 3,366,824.28	\$ 144,053.52	2.69
4 KENERGY RURALS	\$ -	\$ 6,264,058.73	\$ -	\$ 6,264,058.73	\$ 266,899.42	2.69
5 MEADE CO. RURALS	\$ -	\$ 2,623,856.09	\$ -	\$ 2,623,856.09	\$ 110,754.88	2.69
6						
7 TOTAL RURALS	\$ -	\$ 12,254,729.10	\$ 10.00	\$ 12,254,739.10	\$ 521,707.82	2.69
8						
9 KI-ACCURIDE	\$ -	\$ 113,004.58		\$ 113,004.58	\$ 5,270.32	2.69
10 KI-ALCOA	\$ -	\$ 5,974.13		\$ 5,974.13	\$ 239.94	2.69
11 KI-ALERIS	\$ -	\$ 673,626.73		\$ 673,626.73	\$ 33,914.38	2.69
12 KI-AMG ALUMINUM NORTH AMERICA	\$ -	\$ 41,221.79		\$ 41,221.79	\$ 1,649.07	2.69
13 KI-ARMSTRONG - DOCK	\$ 11,560.41	\$ 248,869.24		\$ 248,869.24	\$ 11,336.33	2.69
14 KI-ARMSTRONG - EQUALITY	\$ 3,092.76	\$ 75,740.08		\$ 75,740.08	\$ 3,574.80	2.69
15 KI-ARMSTRONG - LEWIS	\$ 3,858.56	\$ 70,111.14		\$ 70,111.14	\$ 2,579.84	2.69
16 KI-ARMSTRONG - MIDWAY	\$ -	\$ 130,289.08		\$ 130,289.08	\$ 6,821.31	2.69
17 KI-DOMTAR PAPER CO.	\$ -	\$ 483,598.26		\$ 483,598.26	\$ 28,972.49	2.69
18 KI-DOTIKI #3	\$ -	\$ 3,539.10		\$ 3,539.10	\$ 151.24	2.69
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ -	\$ 20,309.25		\$ 20,309.25	\$ 1,101.30	2.69
20 KI-HOPKINS CO. COAL	\$ -	\$ 2,543.23		\$ 2,543.23	\$ 124.37	2.69
21 KI-KIMBERLY-CLARK	\$ -	\$ 1,180,160.41		\$ 1,180,160.41	\$ 69,721.64	2.69
22 KI-PATRIOT COAL, LP	\$ -	\$ -		\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ -	\$ 38,772.60		\$ 38,772.60	\$ 594.72	2.69
24 KI-PRECOAT	\$ -	\$ 77,857.59		\$ 77,857.59	\$ 3,519.28	2.69
25 KI-SEBREE MINING-KMMC	\$ -	\$ 3,105.78		\$ 3,105.78	\$ 151.77	2.69
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ -	\$ 155,279.56		\$ 155,279.56	\$ 7,263.88	2.69
27 KI-SOUTHWIRE CO.	\$ -	\$ 198,314.43		\$ 198,314.43	\$ 10,832.28	2.69
28 KI-TYSON FOODS	\$ -	\$ 272,137.50		\$ 272,137.50	\$ 14,388.55	2.69
29 KI-VALLEY GRAIN	\$ -	\$ 63,939.19		\$ 63,939.19	\$ 3,014.53	2.69
30						
31 SUBTOTAL INDUSTRIALS	\$ 18,511.73	\$ 3,858,393.67	\$ -	\$ 3,858,393.67	\$ 205,222.04	2.69
32						
33 JPI-SHELL OIL	\$ -	\$ 33,908.83		\$ 33,908.83	\$ 1,194.76	2.69
34						
35 TOTAL INDUSTRIALS	\$ 18,511.73	\$ 3,892,302.50	\$ -	\$ 3,892,302.50	\$ 206,416.80	2.69
36						
37						
38 GRAND TOTAL	\$ 18,511.73	\$ 16,147,031.60	\$ 10.00	\$ 16,147,041.60	\$ 728,124.62	2.69

Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
November 2013

	ES \$	ES MILLS/ KWH	UNWIND SURCREDIT (US) \$	US MILLS/ KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
1 NOVEMBER 2013							
2							
3 JP RURALS	\$ 220,902.30	4.13	\$ (176,856.20)	(3.30)	\$ (20,816.06)	\$ -	(0.39)
4 KENERGY RURALS	\$ 410,934.89	4.14	\$ (327,675.55)	(3.31)	\$ (38,567.56)	\$ -	(0.39)
5 MEADE CO. RURALS	\$ 172,073.80	4.18	\$ (135,975.07)	(3.30)	\$ (16,004.33)	\$ -	(0.39)
6							
7 TOTAL RURALS	\$ 803,910.99	4.15	\$ (640,506.82)	(3.31)	\$ (75,387.95)	\$ -	(0.39)
8							
9 KI-ACCURIDE	\$ 7,437.99	3.80	\$ (6,470.43)	(3.31)	\$ (761.57)	\$ -	(0.39)
10 KI-ALCOA	\$ 291.43	3.27	\$ (294.57)	(3.30)	\$ (34.67)	\$ -	(0.39)
11 KI-ALERIS	\$ 44,473.52	3.53	\$ (41,637.08)	(3.30)	\$ (4,900.70)	\$ -	(0.39)
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 2,633.99	4.30	\$ (2,024.58)	(3.31)	\$ (238.29)	\$ -	(0.39)
13 KI-ARMSTRONG - DOCK	\$ 15,634.27	3.71	\$ (13,917.75)	(3.31)	\$ (1,638.13)	\$ -	(0.39)
14 KI-ARMSTRONG - EQUALITY	\$ 4,791.77	3.61	\$ (4,388.82)	(3.31)	\$ (516.57)	\$ -	(0.39)
15 KI-ARMSTRONG - LEWIS	\$ 4,333.14	4.52	\$ (3,167.30)	(3.30)	\$ (372.79)	\$ -	(0.39)
16 KI-ARMSTRONG - MIDWAY	\$ 8,615.99	3.40	\$ (8,374.61)	(3.31)	\$ (985.69)	\$ -	(0.39)
17 KI-DOMTAR PAPER CO.	\$ 32,178.10	2.99	\$ (35,569.87)	(3.30)	\$ (4,186.59)	\$ -	(0.39)
18 KI-DOTIKI #3	\$ 224.06	3.99	\$ (185.67)	(3.30)	\$ (21.85)	\$ -	(0.39)
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 1,345.10	3.29	\$ (1,352.08)	(3.31)	\$ (159.14)	\$ -	(0.39)
20 KI-HOPKINS CO. COAL	\$ 167.03	3.62	\$ (152.69)	(3.30)	\$ (17.97)	\$ -	(0.39)
21 KI-KIMBERLY-CLARK	\$ 78,473.41	3.03	\$ (85,598.08)	(3.31)	\$ (10,074.93)	\$ -	(0.39)
22 KI-PATRIOT COAL, LP	\$ -	0.00	\$ -	0.00	\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 2,486.31	11.25	\$ (730.14)	(3.30)	\$ (85.94)	\$ -	(0.39)
24 KI-PRECOAT	\$ 5,118.55	3.92	\$ (4,320.66)	(3.31)	\$ (508.54)	\$ -	(0.39)
25 KI-SEBREE MINING-KMMC	\$ 204.80	3.63	\$ (186.34)	(3.31)	\$ (21.93)	\$ -	(0.39)
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 10,221.73	3.79	\$ (8,917.95)	(3.31)	\$ (1,049.65)	\$ -	(0.39)
27 KI-SOUTHWIRE CO.	\$ 13,138.83	3.27	\$ (13,298.92)	(3.30)	\$ (1,565.29)	\$ -	(0.39)
28 KI-TYSON FOODS	\$ 18,004.02	3.37	\$ (17,664.99)	(3.30)	\$ (2,079.18)	\$ -	(0.39)
29 KI-VALLEY GRAIN	\$ 3,996.62	3.57	\$ (3,700.97)	(3.30)	\$ (435.61)	\$ -	(0.39)
30							
31 SUBTOTAL INDUSTRIALS	\$ 253,770.66	3.33	\$ (251,953.50)	(3.30)	\$ (29,655.03)	\$ -	(0.39)
32							
33 JPI-SHELL OIL	\$ 2,210.95	4.98	\$ (1,466.83)	(3.31)	\$ (172.65)	\$ -	(0.39)
34							
35 TOTAL INDUSTRIALS	\$ 255,981.61	3.34	\$ (253,420.33)	(3.31)	\$ (29,827.68)	\$ -	(0.39)
36							
37							
38 GRAND TOTAL	\$ 1,059,892.60	3.92	\$ (893,927.15)	(3.31)	\$ (105,215.63)	\$ -	(0.39)

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
November 2013**

	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	REVENUE \$ NET OF MRSM \$	REV NET OF MRSM MILLS/ KWH
1 NOVEMBER 2013						
2						
3 JP RURALS	\$ 3,534,107.84	66.04	\$ (359,979.23)	(6.73)	\$ 3,174,128.61	59.32
4 KENERGY RURALS	\$ 6,575,649.93	66.32	\$ (668,613.78)	(6.74)	\$ 5,907,036.15	59.58
5 MEADE CO. RURALS	\$ 2,754,705.37	66.96	\$ (279,002.45)	(6.78)	\$ 2,475,702.92	60.17
6						
7 TOTAL RURALS	\$ 12,864,463.14	66.38	\$ (1,307,595.46)	(6.75)	\$ 11,556,867.68	59.63
8						
9 KI-ACCURIDE	\$ 118,480.89	60.52	\$ (12,526.24)	(6.40)	\$ 105,954.65	54.12
10 KI-ALCOA	\$ 6,176.26	69.29	\$ (523.09)	(5.87)	\$ 5,653.17	63.43
11 KI-ALERIS	\$ 705,476.85	56.00	\$ (77,216.27)	(6.13)	\$ 628,260.58	49.87
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 43,241.98	70.59	\$ (4,226.09)	(6.90)	\$ 39,015.89	63.69
13 KI-ARMSTRONG - DOCK	\$ 260,283.96	61.81	\$ (26,578.97)	(6.31)	\$ 233,704.99	55.50
14 KI-ARMSTRONG - EQUALITY	\$ 79,201.26	59.64	\$ (8,243.07)	(6.21)	\$ 70,958.19	53.44
15 KI-ARMSTRONG - LEWIS	\$ 73,484.03	76.68	\$ (6,823.86)	(7.12)	\$ 66,660.17	69.56
16 KI-ARMSTRONG - MIDWAY	\$ 136,366.08	53.82	\$ (15,201.64)	(6.00)	\$ 121,164.44	47.82
17 KI-DOMTAR PAPER CO.	\$ 504,992.39	46.92	\$ (60,149.69)	(5.59)	\$ 444,842.70	41.33
18 KI-DOTIKI #3	\$ 3,706.88	65.98	\$ (370.08)	(6.59)	\$ 3,336.80	59.39
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 21,244.43	51.93	\$ (2,408.35)	(5.89)	\$ 18,836.08	46.04
20 KI-HOPKINS CO. COAL	\$ 2,663.97	57.66	\$ (287.10)	(6.21)	\$ 2,376.87	51.45
21 KI-KIMBERLY-CLARK	\$ 1,232,682.45	47.59	\$ (145,786.39)	(5.63)	\$ 1,086,896.06	41.97
22 KI-PATRIOT COAL, LP	\$ -	-	\$ -	0.00	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 41,037.55	185.76	\$ (3,060.49)	(13.85)	\$ 37,977.06	171.90
24 KI-PRECOAT	\$ 81,666.22	62.47	\$ (8,516.25)	(6.51)	\$ 73,149.97	55.95
25 KI-SEBREE MINING-KMMC	\$ 3,254.08	57.72	\$ (351.32)	(6.23)	\$ 2,902.76	51.49
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 162,797.57	60.33	\$ (17,234.66)	(6.39)	\$ 145,562.91	53.95
27 KI-SOUTHWIRE CO.	\$ 207,421.33	51.55	\$ (23,596.89)	(5.86)	\$ 183,824.44	45.68
28 KI-TYSON FOODS	\$ 284,785.90	53.28	\$ (31,895.50)	(5.97)	\$ 252,890.40	47.31
29 KI-VALLEY GRAIN	\$ 66,813.76	59.67	\$ (6,907.01)	(6.17)	\$ 59,906.75	53.50
30						
31 SUBTOTAL INDUSTRIALS	\$ 4,035,777.84	52.94	\$ (451,902.96)	(5.93)	\$ 3,583,874.88	47.01
32						
33 JPI-SHELL OIL	\$ 35,675.06	80.38	\$ (3,364.43)	(7.58)	\$ 32,310.63	72.80
34						
35 TOTAL INDUSTRIALS	\$ 4,071,452.90	53.10	\$ (455,267.39)	(5.94)	\$ 3,616,185.51	47.16
36						
37						
38 GRAND TOTAL	\$ 16,935,916.04	62.61	\$ (1,762,862.85)	(6.52)	\$ 15,173,053.19	56.10

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
December 2013**

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$
1 DECEMBER 2013						
2						
3 JP RURALS	127,696	65,834,300	\$ 1,649,066.14	\$ 2,304,200.50	\$ 3,953,266.64	\$ -
4 KENERGY RURALS	244,394	119,798,440	\$ 3,156,104.12	\$ 4,192,945.40	\$ 7,349,049.52	\$ -
5 MEADE CO. RURALS	112,545	51,131,760	\$ 1,453,406.13	\$ 1,789,611.60	\$ 3,243,017.73	\$ -
6						
7 TOTAL RURALS	484,635	236,764,500	\$ 6,258,576.39	\$ 8,286,757.50	\$ 14,545,333.89	\$ -
8						
9 KI-ACCURIDE	5,133	1,903,550	\$ 55,000.10	\$ 57,106.50	\$ 112,106.60	\$ -
10 KI-ALCOA	161	64,260	\$ 1,725.12	\$ 1,927.80	\$ 3,652.92	\$ 1,650.11
11 KI-ALERIS	28,059	12,696,400	\$ 300,652.19	\$ 380,892.00	\$ 681,544.19	\$ -
12 KI-AMG ALUMINUM NORTH AMERICA	2,316	612,990	\$ 24,815.94	\$ 18,389.70	\$ 43,205.64	\$ -
13 KI-ARMSTRONG - DOCK	10,729	4,336,170	\$ 114,961.24	\$ 130,085.10	\$ 245,046.34	\$ -
14 KI-ARMSTRONG - EQUALITY	3,213	1,340,910	\$ 34,427.30	\$ 40,227.30	\$ 74,654.60	\$ -
15 KI-ARMSTRONG - LEWIS	3,500	1,131,890	\$ 37,502.50	\$ 33,956.70	\$ 71,459.20	\$ -
16 KI-ARMSTRONG - MIDWAY	5,005	2,727,250	\$ 53,628.58	\$ 81,817.50	\$ 135,446.08	\$ -
17 KI-DOMTAR PAPER CO.	15,000	10,875,028	\$ 160,725.00	\$ 326,250.84	\$ 486,975.84	\$ -
18 KI-DOTIKI #3	69	28,890	\$ 739.34	\$ 866.70	\$ 1,606.04	\$ 21.43
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	750	430,680	\$ 8,036.25	\$ 12,920.40	\$ 20,956.65	\$ -
20 KI-HOPKINS CO. COAL	113	58,750	\$ 1,210.80	\$ 1,762.50	\$ 2,973.30	\$ -
21 KI-KIMBERLY-CLARK	38,016	27,159,340	\$ 407,341.44	\$ 814,780.20	\$ 1,222,121.64	\$ -
22 KI-PATRIOT COAL, LP	0	0	\$ -	\$ -	\$ -	\$ -
23 KI-PENNYRILE ENERGY, LLC	3,000	319,435	\$ 32,145.00	\$ 9,583.05	\$ 41,728.05	\$ -
24 KI-PRECOAT	3,591	1,197,990	\$ 38,477.57	\$ 35,939.70	\$ 74,417.27	\$ -
25 KI-SEBREE MINING-KMMC	164	82,170	\$ 1,757.26	\$ 2,465.10	\$ 4,222.36	\$ -
26 KI-SEBREE MINING-STEAMPORT-ALLIED	6,765	2,291,540	\$ 72,486.98	\$ 68,746.20	\$ 141,233.18	\$ -
27 KI-SOUTHWIRE CO.	6,668	3,944,400	\$ 71,447.62	\$ 118,332.00	\$ 189,779.62	\$ -
28 KI-TYSON FOODS	10,361	5,390,550	\$ 111,018.12	\$ 161,716.50	\$ 272,734.62	\$ -
29 KI-VALLEY GRAIN	2,214	1,226,730	\$ 23,723.01	\$ 36,801.90	\$ 60,524.91	\$ 2,635.89
30						
31 SUBTOTAL INDUSTRIALS	144,827	77,818,923	\$ 1,551,821.36	\$ 2,334,567.69	\$ 3,886,389.05	\$ 4,307.43
32						
33 JPI-SHELL OIL	1,912	477,060	\$ 20,487.08	\$ 14,311.80	\$ 34,798.88	\$ -
34						
35 TOTAL INDUSTRIALS	146,739	78,295,983	\$ 1,572,308.44	\$ 2,348,879.49	\$ 3,921,187.93	\$ 4,307.43
36						
37						
38 GRAND TOTAL	631,374	315,060,483	\$ 7,830,884.83	\$ 10,635,636.99	\$ 18,466,521.82	\$ 4,307.43

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
December 2013**

	BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FUEL ADJUSTMENT CLAUSE \$	FAC MILLS/ KWH
1 DECEMBER 2013						
2						
3 JP RURALS	\$ -	\$ 3,953,266.64	\$ 10.00	\$ 3,953,276.64	\$ 171,037.51	2.60
4 KENERGY RURALS	\$ -	\$ 7,349,049.52	\$ -	\$ 7,349,049.52	\$ 311,236.35	2.60
5 MEADE CO. RURALS	\$ -	\$ 3,243,017.73	\$ -	\$ 3,243,017.73	\$ 132,840.31	2.60
6						
7 TOTAL RURALS	\$ -	\$ 14,545,333.89	\$ 10.00	\$ 14,545,343.89	\$ 615,114.17	2.60
8						
9 KI-ACCURIDE	\$ -	\$ 112,106.60		\$ 112,106.60	\$ 4,945.42	2.60
10 KI-ALCOA	\$ -	\$ 5,303.03		\$ 5,303.03	\$ 166.95	2.60
11 KI-ALERIS	\$ -	\$ 681,544.19		\$ 681,544.19	\$ 32,985.25	2.60
12 KI-AMG ALUMINUM NORTH AMERICA	\$ -	\$ 43,205.64		\$ 43,205.64	\$ 1,592.55	2.60
13 KI-ARMSTRONG - DOCK	\$ 13,121.04	\$ 258,167.38		\$ 258,167.38	\$ 11,265.37	2.60
14 KI-ARMSTRONG - EQUALITY	\$ 3,205.37	\$ 77,859.97		\$ 77,859.97	\$ 3,483.68	2.60
15 KI-ARMSTRONG - LEWIS	\$ 5,185.57	\$ 76,644.77		\$ 76,644.77	\$ 2,940.65	2.60
16 KI-ARMSTRONG - MIDWAY	\$ -	\$ 135,446.08		\$ 135,446.08	\$ 7,085.40	2.60
17 KI-DOMTAR PAPER CO.	\$ -	\$ 486,975.84		\$ 486,975.84	\$ 28,253.32	2.60
18 KI-DOTIKI #3	\$ -	\$ 1,627.47		\$ 1,627.47	\$ 75.06	2.60
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ -	\$ 20,956.65		\$ 20,956.65	\$ 1,118.91	2.60
20 KI-HOPKINS CO. COAL	\$ -	\$ 2,973.30		\$ 2,973.30	\$ 152.63	2.60
21 KI-KIMBERLY-CLARK	\$ -	\$ 1,222,121.64		\$ 1,222,121.64	\$ 70,559.97	2.60
22 KI-PATRIOT COAL, LP	\$ -	\$ -		\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ -	\$ 41,728.05		\$ 41,728.05	\$ 829.89	2.60
24 KI-PRECOAT	\$ -	\$ 74,417.27		\$ 74,417.27	\$ 3,112.38	2.60
25 KI-SEBREE MINING-KMMC	\$ -	\$ 4,222.36		\$ 4,222.36	\$ 213.48	2.60
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ -	\$ 141,233.18		\$ 141,233.18	\$ 5,953.42	2.60
27 KI-SOUTHWIRE CO.	\$ -	\$ 189,779.62		\$ 189,779.62	\$ 10,247.55	2.60
28 KI-TYSON FOODS	\$ -	\$ 272,734.62		\$ 272,734.62	\$ 14,004.65	2.60
29 KI-VALLEY GRAIN	\$ -	\$ 63,160.80		\$ 63,160.80	\$ 3,187.04	2.60
30						
31 SUBTOTAL INDUSTRIALS	\$ 21,511.98	\$ 3,912,208.46	\$ -	\$ 3,912,208.46	\$ 202,173.57	2.60
32						
33 JPI-SHELL OIL	\$ -	\$ 34,798.88		\$ 34,798.88	\$ 1,239.40	2.60
34						
35 TOTAL INDUSTRIALS	\$ 21,511.98	\$ 3,947,007.34	\$ -	\$ 3,947,007.34	\$ 203,412.97	2.60
36						
37						
38 GRAND TOTAL	\$ 21,511.98	\$ 18,492,341.23	\$ 10.00	\$ 18,492,351.23	\$ 818,527.14	2.60

Case No. 2014-00230

Attachment for Response to Staff Item 6

Witness: Nicholas R. Castlen

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Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
December 2013

	ES \$	ES MILLS/ KWH	UNWIND SURCREDIT (US) \$	US MILLS/ KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
1 DECEMBER 2013							
2							
3 JP RURALS	\$ 246,576.20	3.75	\$ (217,582.36)	(3.30)	\$ (25,609.54)	\$ -	(0.39)
4 KENERGY RURALS	\$ 458,036.89	3.82	\$ (395,933.84)	(3.30)	\$ (46,601.59)	\$ -	(0.39)
5 MEADE CO. RURALS	\$ 201,893.98	3.95	\$ (168,990.47)	(3.31)	\$ (19,890.25)	\$ -	(0.39)
6							
7 TOTAL RURALS	\$ 906,507.07	3.83	\$ (782,506.67)	(3.30)	\$ (92,101.38)	\$ -	(0.39)
8							
9 KI-ACCURIDE	\$ 6,997.27	3.68	\$ (6,291.23)	(3.30)	\$ (740.48)	\$ -	(0.39)
10 KI-ALCOA	\$ 228.30	3.55	\$ (212.38)	(3.31)	\$ (25.00)	\$ -	(0.39)
11 KI-ALERIS	\$ 42,688.75	3.36	\$ (41,961.60)	(3.30)	\$ (4,938.90)	\$ -	(0.39)
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 2,680.70	4.37	\$ (2,025.93)	(3.30)	\$ (238.45)	\$ -	(0.39)
13 KI-ARMSTRONG - DOCK	\$ 15,318.16	3.53	\$ (14,331.04)	(3.30)	\$ (1,686.77)	\$ -	(0.39)
14 KI-ARMSTRONG - EQUALITY	\$ 4,669.39	3.48	\$ (4,431.71)	(3.31)	\$ (521.61)	\$ -	(0.39)
15 KI-ARMSTRONG - LEWIS	\$ 4,449.38	3.93	\$ (3,740.90)	(3.31)	\$ (440.31)	\$ -	(0.39)
16 KI-ARMSTRONG - MIDWAY	\$ 8,510.83	3.12	\$ (9,013.56)	(3.30)	\$ (1,060.90)	\$ -	(0.39)
17 KI-DOMTAR PAPER CO.	\$ 30,741.53	2.83	\$ (35,941.97)	(3.31)	\$ (4,230.39)	\$ -	(0.39)
18 KI-DOTIKI #3	\$ 100.46	3.48	\$ (95.48)	(3.30)	\$ (11.24)	\$ -	(0.39)
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 1,317.98	3.06	\$ (1,423.40)	(3.31)	\$ (167.53)	\$ -	(0.39)
20 KI-HOPKINS CO. COAL	\$ 186.68	3.18	\$ (194.17)	(3.31)	\$ (22.85)	\$ -	(0.39)
21 KI-KIMBERLY-CLARK	\$ 77,131.74	2.84	\$ (89,761.62)	(3.31)	\$ (10,564.98)	\$ -	(0.39)
22 KI-PATRIOT COAL, LP	\$ -	0.00	\$ -	0.00	\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 2,552.80	7.99	\$ (1,055.73)	(3.30)	\$ (124.26)	\$ -	(0.39)
24 KI-PRECOAT	\$ 4,636.12	3.87	\$ (3,959.36)	(3.31)	\$ (466.02)	\$ -	(0.39)
25 KI-SEBREE MINING-KMMC	\$ 264.94	3.22	\$ (271.57)	(3.30)	\$ (31.96)	\$ -	(0.39)
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 8,801.07	3.84	\$ (7,573.54)	(3.31)	\$ (891.41)	\$ -	(0.39)
27 KI-SOUTHWIRE CO.	\$ 11,941.27	3.03	\$ (13,036.24)	(3.30)	\$ (1,534.37)	\$ -	(0.39)
28 KI-TYSON FOODS	\$ 17,124.00	3.18	\$ (17,815.77)	(3.31)	\$ (2,096.92)	\$ -	(0.39)
29 KI-VALLEY GRAIN	\$ 3,804.18	3.10	\$ (4,054.34)	(3.30)	\$ (477.20)	\$ -	(0.39)
30							
31 SUBTOTAL INDUSTRIALS	\$ 244,145.55	3.14	\$ (257,191.54)	(3.30)	\$ (30,271.55)	\$ -	(0.39)
32							
33 JPI-SHELL OIL	\$ 2,156.89	4.52	\$ (1,576.68)	(3.30)	\$ (185.58)	\$ -	(0.39)
34							
35 TOTAL INDUSTRIALS	\$ 246,302.44	3.15	\$ (258,768.22)	(3.30)	\$ (30,457.13)	\$ -	(0.39)
36							
37							
38 GRAND TOTAL	\$ 1,152,809.51	3.66	\$ (1,041,274.89)	(3.30)	\$ (122,558.51)	\$ -	(0.39)

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
December 2013**

	REVENUE \$	REVENUE MILLS/ KWH	MRS M \$	MRS M MILLS/ KWH	REVENUE \$ NET OF MRS \$	REV NET OF MRS MILLS/ KWH
1 DECEMBER 2013						
2						
3 JP RURALS	\$ 4,127,698.45	62.70	\$ (411,491.12)	(6.25)	\$ 3,716,207.33	56.45
4 KENERGY RURALS	\$ 7,675,787.33	64.07	\$ (758,131.99)	(6.33)	\$ 6,917,655.34	57.74
5 MEADE CO. RURALS	\$ 3,388,871.30	66.28	\$ (329,979.03)	(6.45)	\$ 3,058,892.27	59.82
6						
7 TOTAL RURALS	\$ 15,192,357.08	64.17	\$ (1,499,602.14)	(6.33)	\$ 13,692,754.94	57.83
8						
9 KI-ACCURIDE	\$ 117,017.58	61.47	\$ (11,765.66)	(6.18)	\$ 105,251.92	55.29
10 KI-ALCOA	\$ 5,460.90	84.98	\$ (389.27)	(6.06)	\$ 5,071.63	78.92
11 KI-ALERIS	\$ 710,317.69	55.95	\$ (74,493.24)	(5.87)	\$ 635,824.45	50.08
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 45,214.51	73.76	\$ (4,216.24)	(6.88)	\$ 40,998.27	66.88
13 KI-ARMSTRONG - DOCK	\$ 268,733.10	61.97	\$ (26,180.27)	(6.04)	\$ 242,552.83	55.94
14 KI-ARMSTRONG - EQUALITY	\$ 81,059.72	60.45	\$ (8,028.36)	(5.99)	\$ 73,031.36	54.46
15 KI-ARMSTRONG - LEWIS	\$ 79,853.59	70.55	\$ (7,284.76)	(6.44)	\$ 72,568.83	64.11
16 KI-ARMSTRONG - MIDWAY	\$ 140,967.85	51.69	\$ (15,342.60)	(5.63)	\$ 125,625.25	46.06
17 KI-DOMTAR PAPER CO.	\$ 505,798.33	46.51	\$ (57,983.47)	(5.33)	\$ 447,814.86	41.18
18 KI-DOTIKI #3	\$ 1,696.27	58.71	\$ (172.83)	(5.98)	\$ 1,523.44	52.73
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 21,802.61	50.62	\$ (2,396.83)	(5.57)	\$ 19,405.78	45.06
20 KI-HOPKINS CO. COAL	\$ 3,095.59	52.69	\$ (333.85)	(5.68)	\$ 2,761.74	47.01
21 KI-KIMBERLY-CLARK	\$ 1,269,486.75	46.74	\$ (145,165.89)	(5.34)	\$ 1,124,320.86	41.40
22 KI-PATRIOT COAL, LP	\$ -	-	\$ -	0.00	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 43,930.75	137.53	\$ (3,352.98)	(10.50)	\$ 40,577.77	127.03
24 KI-PRECOAT	\$ 77,740.39	64.89	\$ (7,637.08)	(6.37)	\$ 70,103.31	58.52
25 KI-SEBREE MINING-KMMC	\$ 4,397.25	53.51	\$ (470.78)	(5.73)	\$ 3,926.47	47.78
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 147,522.72	64.38	\$ (14,541.38)	(6.35)	\$ 132,981.34	58.03
27 KI-SOUTHWIRE CO.	\$ 197,397.83	50.05	\$ (21,821.99)	(5.53)	\$ 175,575.84	44.51
28 KI-TYSON FOODS	\$ 283,950.58	52.68	\$ (30,627.33)	(5.68)	\$ 253,323.25	46.99
29 KI-VALLEY GRAIN	\$ 65,620.48	53.49	\$ (6,877.14)	(5.61)	\$ 58,743.34	47.89
30						
31 SUBTOTAL INDUSTRIALS	\$ 4,071,064.49	52.31	\$ (439,081.95)	(5.64)	\$ 3,631,982.54	46.67
32						
33 JPI-SHELL OIL	\$ 36,432.91	76.37	\$ (3,351.93)	(7.03)	\$ 33,080.98	69.34
34						
35 TOTAL INDUSTRIALS	\$ 4,107,497.40	52.46	\$ (442,433.88)	(5.65)	\$ 3,665,063.52	46.81
36						
37						
38 GRAND TOTAL	\$ 19,299,854.48	61.26	\$ (1,942,036.02)	(6.16)	\$ 17,357,818.46	55.09

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
January 2014**

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$
1 JANUARY 2014						
2						
3 JP RURALS	155,802	75,833,790	\$ 2,012,027.03	\$ 2,654,182.65	\$ 4,666,209.68	\$ -
4 KENERGY RURALS	308,098	142,543,380	\$ 3,978,777.57	\$ 4,989,018.30	\$ 8,967,795.87	\$ -
5 MEADE CO. RURALS	148,456	63,939,130	\$ 1,917,160.78	\$ 2,237,869.55	\$ 4,155,030.33	\$ -
6						
7 TOTAL RURALS	612,356	282,316,300	\$ 7,907,965.38	\$ 9,881,070.50	\$ 17,789,035.88	\$ -
8						
9 KI-ACCURIDE	5,171	2,032,510	\$ 55,407.27	\$ 60,975.30	\$ 116,382.57	\$ -
10 KI-ALCOA	116	50,210	\$ 1,242.94	\$ 1,506.30	\$ 2,749.24	\$ 717.91
11 KI-ALERIS	27,617	14,685,350	\$ 295,916.16	\$ 440,560.50	\$ 736,476.66	\$ -
12 KI-AMG ALUMINUM NORTH AMERICA	2,095	792,570	\$ 22,447.93	\$ 23,777.10	\$ 46,225.03	\$ -
13 KI-ARMSTRONG - DOCK	10,886	4,737,420	\$ 116,643.49	\$ 142,122.60	\$ 258,766.09	\$ -
14 KI-ARMSTRONG - EQUALITY	3,289	1,441,150	\$ 35,241.64	\$ 43,234.50	\$ 78,476.14	\$ -
15 KI-ARMSTRONG - LEWIS	3,500	1,244,140	\$ 37,502.50	\$ 37,324.20	\$ 74,826.70	\$ -
16 KI-ARMSTRONG - MIDWAY	5,037	2,444,610	\$ 53,971.46	\$ 73,338.30	\$ 127,309.76	\$ -
17 KI-DOMTAR PAPER CO.	15,000	10,768,350	\$ 160,725.00	\$ 323,050.50	\$ 483,775.50	\$ -
18 KI-DOTIKI #3	85	32,610	\$ 910.78	\$ 978.30	\$ 1,889.08	\$ -
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	750	506,120	\$ 8,036.25	\$ 15,183.60	\$ 23,219.85	\$ -
20 KI-HOPKINS CO. COAL	113	67,390	\$ 1,210.80	\$ 2,021.70	\$ 3,232.50	\$ 53.58
21 KI-KIMBERLY-CLARK	37,930	26,469,680	\$ 406,419.95	\$ 794,090.40	\$ 1,200,510.35	\$ -
22 KI-PATRIOT COAL, LP			\$ -	\$ -	\$ -	\$ -
23 KI-PENNYRILE ENERGY, LLC	3,000	323,390	\$ 32,145.00	\$ 9,701.70	\$ 41,846.70	\$ -
24 KI-PRECOAT	3,621	1,527,390	\$ 38,799.02	\$ 45,821.70	\$ 84,620.72	\$ 878.63
25 KI-SEBREE MINING-KMMC	186	79,470	\$ 1,992.99	\$ 2,384.10	\$ 4,377.09	\$ -
26 KI-SEBREE MINING-STEAMPORT-ALLIED	7,319	3,076,720	\$ 78,423.09	\$ 92,301.60	\$ 170,724.69	\$ -
27 KI-SOUTHWIRE CO.	7,001	4,193,410	\$ 75,015.72	\$ 125,802.30	\$ 200,818.02	\$ -
28 KI-TYSON FOODS	9,850	5,578,820	\$ 105,542.75	\$ 167,364.60	\$ 272,907.35	\$ -
29 KI-VALLEY GRAIN	2,270	1,100,750	\$ 24,323.05	\$ 33,022.50	\$ 57,345.55	\$ 2,700.18
30						
31 SUBTOTAL INDUSTRIALS	144,836	81,152,060	\$ 1,551,917.79	\$ 2,434,561.80	\$ 3,986,479.59	\$ 4,350.30
32						
33 JPI-SHELL OIL	2,020	371,920	\$ 21,644.30	\$ 11,157.60	\$ 32,801.90	\$ -
34						
35 TOTAL INDUSTRIALS	146,856	81,523,980	\$ 1,573,562.09	\$ 2,445,719.40	\$ 4,019,281.49	\$ 4,350.30
36						
37						
38 GRAND TOTAL	759,212	363,840,280	\$ 9,481,527.47	\$ 12,326,789.90	\$ 21,808,317.37	\$ 4,350.30

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
January 2014**

	BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FUEL ADJUSTMENT CLAUSE \$	FAC MILLS/ KWH
1 JANUARY 2014						
2						
3 JP RURALS	\$ -	\$ 4,666,209.68	\$ 10.00	\$ 4,666,219.68	\$ 159,781.80	2.11
4 KENERGY RURALS	\$ -	\$ 8,967,795.87	\$ -	\$ 8,967,795.87	\$ 300,338.90	2.11
5 MEADE CO. RURALS	\$ -	\$ 4,155,030.33	\$ -	\$ 4,155,030.33	\$ 134,719.75	2.11
6						
7 TOTAL RURALS	\$ -	\$ 17,789,035.88	\$ 10.00	\$ 17,789,045.88	\$ 594,840.45	2.11
8						
9 KI-ACCURIDE	\$ -	\$ 116,382.57		\$ 116,382.57	\$ 4,282.50	2.11
10 KI-ALCOA	\$ -	\$ 3,467.15		\$ 3,467.15	\$ 105.79	2.11
11 KI-ALERIS	\$ -	\$ 736,476.66		\$ 736,476.66	\$ 30,942.03	2.11
12 KI-AMG ALUMINUM NORTH AMERICA	\$ -	\$ 46,225.03		\$ 46,225.03	\$ 1,669.94	2.11
13 KI-ARMSTRONG - DOCK	\$ 9,331.34	\$ 268,097.43		\$ 268,097.43	\$ 9,981.74	2.11
14 KI-ARMSTRONG - EQUALITY	\$ 2,596.26	\$ 81,072.40		\$ 81,072.40	\$ 3,036.50	2.11
15 KI-ARMSTRONG - LEWIS	\$ 3,199.80	\$ 78,026.50		\$ 78,026.50	\$ 2,621.40	2.11
16 KI-ARMSTRONG - MIDWAY	\$ -	\$ 127,309.76		\$ 127,309.76	\$ 5,150.79	2.11
17 KI-DOMTAR PAPER CO.	\$ -	\$ 483,775.50		\$ 483,775.50	\$ 22,688.91	2.11
18 KI-DOTIKI #3	\$ -	\$ 1,889.08		\$ 1,889.08	\$ 68.71	2.11
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ -	\$ 23,219.85		\$ 23,219.85	\$ 1,066.39	2.11
20 KI-HOPKINS CO. COAL	\$ -	\$ 3,286.08		\$ 3,286.08	\$ 141.99	2.11
21 KI-KIMBERLY-CLARK	\$ -	\$ 1,200,510.35		\$ 1,200,510.35	\$ 55,771.62	2.11
22 KI-PATRIOT COAL, LP	\$ -	\$ -		\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ -	\$ 41,846.70		\$ 41,846.70	\$ 681.38	2.11
24 KI-PRECOAT	\$ -	\$ 85,499.35		\$ 85,499.35	\$ 3,218.21	2.11
25 KI-SEBREE MINING-KMMC	\$ -	\$ 4,377.09		\$ 4,377.09	\$ 167.44	2.11
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ -	\$ 170,724.69		\$ 170,724.69	\$ 6,482.65	2.11
27 KI-SOUTHWIRE CO.	\$ -	\$ 200,818.02		\$ 200,818.02	\$ 8,835.51	2.11
28 KI-TYSON FOODS	\$ -	\$ 272,907.35		\$ 272,907.35	\$ 11,754.57	2.11
29 KI-VALLEY GRAIN	\$ -	\$ 60,045.73		\$ 60,045.73	\$ 2,319.28	2.11
30						
31 SUBTOTAL INDUSTRIALS	\$ 15,127.40	\$ 4,005,957.29	\$ -	\$ 4,005,957.29	\$ 170,987.35	2.11
32						
33 JPI-SHELL OIL	\$ -	\$ 32,801.90		\$ 32,801.90	\$ 783.64	2.11
34						
35 TOTAL INDUSTRIALS	\$ 15,127.40	\$ 4,038,759.19	\$ -	\$ 4,038,759.19	\$ 171,770.99	2.11
36						
37						
38 GRAND TOTAL	\$ 15,127.40	\$ 21,827,795.07	\$ 10.00	\$ 21,827,805.07	\$ 766,611.44	2.11

Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
January 2014

	ES \$	ES MILLS/ KWH	UNWIND SURCREDIT (US) \$	US MILLS/ KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
1 JANUARY 2014							
2							
3 JP RURALS	\$ 314,415.48	4.15	\$ (17,062.60)	(0.22)	\$ (29,499.34)	\$ -	(0.39)
4 KENERGY RURALS	\$ 603,901.94	4.24	\$ (32,072.26)	(0.22)	\$ (55,449.37)	\$ -	(0.39)
5 MEADE CO. RURALS	\$ 279,567.56	4.37	\$ (14,386.30)	(0.22)	\$ (24,872.32)	\$ -	(0.39)
6							
7 TOTAL RURALS	\$ 1,197,884.98	4.24	\$ (63,521.16)	(0.22)	\$ (109,821.03)	\$ -	(0.39)
8							
9 KI-ACCURIDE	\$ 7,857.90	3.87	\$ (457.31)	(0.22)	\$ (790.65)	\$ -	(0.39)
10 KI-ALCOA	\$ 185.87	3.70	\$ (11.30)	(0.23)	\$ (19.53)	\$ -	(0.39)
11 KI-ALERIS	\$ 49,930.69	3.40	\$ (3,304.20)	(0.22)	\$ (5,712.60)	\$ -	(0.39)
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 3,119.36	3.94	\$ (178.33)	(0.23)	\$ (308.31)	\$ -	(0.39)
13 KI-ARMSTRONG - DOCK	\$ 17,495.92	3.69	\$ (1,065.92)	(0.23)	\$ (1,842.86)	\$ -	(0.39)
14 KI-ARMSTRONG - EQUALITY	\$ 5,306.50	3.68	\$ (324.26)	(0.23)	\$ (560.61)	\$ -	(0.39)
15 KI-ARMSTRONG - LEWIS	\$ 5,045.09	4.06	\$ (279.93)	(0.22)	\$ (483.97)	\$ -	(0.39)
16 KI-ARMSTRONG - MIDWAY	\$ 8,620.60	3.53	\$ (550.04)	(0.23)	\$ (950.95)	\$ -	(0.39)
17 KI-DOMTAR PAPER CO.	\$ 32,924.73	3.06	\$ (2,422.88)	(0.23)	\$ (4,188.89)	\$ -	(0.39)
18 KI-DOTIKI #3	\$ 127.50	3.91	\$ (7.34)	(0.23)	\$ (12.69)	\$ -	(0.39)
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 1,579.08	3.12	\$ (113.88)	(0.23)	\$ (196.88)	\$ -	(0.39)
20 KI-HOPKINS CO. COAL	\$ 219.48	3.26	\$ (15.16)	(0.22)	\$ (26.21)	\$ -	(0.39)
21 KI-KIMBERLY-CLARK	\$ 81,675.74	3.09	\$ (5,955.68)	(0.23)	\$ (10,296.71)	\$ -	(0.39)
22 KI-PATRIOT COAL, LP	\$ -	0.00	\$ -	0.00	\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 2,779.52	8.59	\$ (72.76)	(0.22)	\$ (125.80)	\$ -	(0.39)
24 KI-PRECOAT	\$ 5,718.99	3.74	\$ (343.66)	(0.22)	\$ (594.15)	\$ -	(0.39)
25 KI-SEBREE MINING-KMMC	\$ 295.87	3.72	\$ (17.88)	(0.22)	\$ (30.91)	\$ -	(0.39)
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 11,537.69	3.75	\$ (692.26)	(0.22)	\$ (1,196.84)	\$ -	(0.39)
27 KI-SOUTHWIRE CO.	\$ 13,636.10	3.25	\$ (943.52)	(0.23)	\$ (1,631.24)	\$ -	(0.39)
28 KI-TYSON FOODS	\$ 18,517.65	3.32	\$ (1,255.23)	(0.22)	\$ (2,170.16)	\$ -	(0.39)
29 KI-VALLEY GRAIN	\$ 3,883.03	3.53	\$ (247.67)	(0.23)	\$ (428.19)	\$ -	(0.39)
30							
31 SUBTOTAL INDUSTRIALS	\$ 270,457.31	3.33	\$ (18,259.21)	(0.22)	\$ (31,568.15)	\$ -	(0.39)
32							
33 JPI-SHELL OIL	\$ 2,192.09	5.89	\$ (83.68)	(0.22)	\$ (144.68)	\$ -	(0.39)
34							
35 TOTAL INDUSTRIALS	\$ 272,649.40	3.34	\$ (18,342.89)	(0.22)	\$ (31,712.83)	\$ -	(0.39)
36							
37							
38 GRAND TOTAL	\$ 1,470,534.38	4.04	\$ (81,864.05)	(0.22)	\$ (141,533.86)	\$ -	(0.39)

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
January 2014**

	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	REVENUE \$ NET OF MRSM \$	REV NET OF MRSM MILLS/ KWH
1 JANUARY 2014						
2						
3 JP RURALS	\$ 5,093,855.02	67.17	\$ (700,712.81)	(9.24)	\$ 4,393,142.21	57.93
4 KENERGY RURALS	\$ 9,784,515.08	68.64	\$ (1,330,017.92)	(9.33)	\$ 8,454,497.16	59.31
5 MEADE CO. RURALS	\$ 4,530,059.02	70.85	\$ (605,273.50)	(9.47)	\$ 3,924,785.52	61.38
6						
7 TOTAL RURALS	\$ 19,408,429.12	68.75	\$ (2,636,004.23)	(9.34)	\$ 16,772,424.89	59.41
8						
9 KI-ACCURIDE	\$ 127,275.01	62.62	\$ (18,211.51)	(8.96)	\$ 109,063.50	53.66
10 KI-ALCOA	\$ 3,727.98	74.25	\$ (441.63)	(8.80)	\$ 3,286.35	65.45
11 KI-ALERIS	\$ 808,332.58	55.04	\$ (124,737.86)	(8.49)	\$ 683,594.72	46.55
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 50,527.69	63.75	\$ (7,156.70)	(9.03)	\$ 43,370.99	54.72
13 KI-ARMSTRONG - DOCK	\$ 292,666.31	61.78	\$ (41,628.33)	(8.79)	\$ 251,037.98	52.99
14 KI-ARMSTRONG - EQUALITY	\$ 88,530.53	61.43	\$ (12,647.71)	(8.78)	\$ 75,882.82	52.65
15 KI-ARMSTRONG - LEWIS	\$ 84,929.09	68.26	\$ (11,382.74)	(9.15)	\$ 73,546.35	59.11
16 KI-ARMSTRONG - MIDWAY	\$ 139,580.16	57.10	\$ (21,073.44)	(8.62)	\$ 118,506.72	48.48
17 KI-DOMTAR PAPER CO.	\$ 532,777.37	49.48	\$ (87,778.70)	(8.15)	\$ 444,998.67	41.32
18 KI-DOTIKI #3	\$ 2,065.26	63.33	\$ (293.61)	(9.00)	\$ 1,771.65	54.33
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 25,554.56	50.49	\$ (4,157.25)	(8.21)	\$ 21,397.31	42.28
20 KI-HOPKINS CO. COAL	\$ 3,606.18	53.51	\$ (562.77)	(8.35)	\$ 3,043.41	45.16
21 KI-KIMBERLY-CLARK	\$ 1,321,705.32	49.93	\$ (216,512.29)	(8.18)	\$ 1,105,193.03	41.75
22 KI-PATRIOT COAL, LP	\$ -	-	\$ -	0.00	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 45,109.04	139.49	\$ (4,426.87)	(13.69)	\$ 40,682.17	125.80
24 KI-PRECOAT	\$ 93,498.74	61.21	\$ (13,499.52)	(8.84)	\$ 79,999.22	52.38
25 KI-SEBREE MINING-KMMC	\$ 4,791.61	60.29	\$ (700.69)	(8.82)	\$ 4,090.92	51.48
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 186,855.93	60.73	\$ (27,210.50)	(8.84)	\$ 159,645.43	51.89
27 KI-SOUTHWIRE CO.	\$ 220,714.87	52.63	\$ (34,997.32)	(8.35)	\$ 185,717.55	44.29
28 KI-TYSON FOODS	\$ 299,754.18	53.73	\$ (46,936.16)	(8.41)	\$ 252,818.02	45.32
29 KI-VALLEY GRAIN	\$ 65,572.18	59.57	\$ (9,490.25)	(8.62)	\$ 56,081.93	50.95
30						
31 SUBTOTAL INDUSTRIALS	\$ 4,397,574.59	54.19	\$ (683,845.85)	(8.43)	\$ 3,713,728.74	45.76
32						
33 JPI-SHELL OIL	\$ 35,549.27	95.58	\$ (4,086.66)	(10.99)	\$ 31,462.61	84.60
34						
35 TOTAL INDUSTRIALS	\$ 4,433,123.86	54.38	\$ (687,932.51)	(8.44)	\$ 3,745,191.35	45.94
36						
37						
38 GRAND TOTAL	\$ 23,841,552.98	65.53	\$ (3,323,936.74)	(9.14)	\$ 20,517,616.24	56.39

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
February 2014**

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$
1 FEBRUARY 2014						
2						
3 JP RURALS	143,644	63,540,310	\$ 3,554,039.85	\$ 2,223,910.85	\$ 5,777,950.70	\$ -
4 KENERGY RURALS	274,393	117,913,463	\$ 6,789,031.61	\$ 4,126,971.21	\$ 10,916,002.82	\$ -
5 MEADE CO. RURALS	124,228	50,794,624	\$ 3,073,649.18	\$ 1,777,811.84	\$ 4,851,461.02	\$ -
6						
7 TOTAL RURALS	542,265	232,248,397	\$ 13,416,720.64	\$ 8,128,693.90	\$ 21,545,414.54	\$ -
8						
9 KI-ACCURIDE	4,922	1,951,320	\$ 88,492.64	\$ 68,296.20	\$ 156,788.84	\$ -
10 KI-ALCOA	70	41,200	\$ 1,258.53	\$ 1,442.00	\$ 2,700.53	\$ 1,204.59
11 KI-ALERIS	28,311	14,154,480	\$ 509,003.47	\$ 495,406.80	\$ 1,004,410.27	\$ -
12 KI-AMG ALUMINUM NORTH AMERICA	2,001	638,920	\$ 35,975.98	\$ 22,362.20	\$ 58,338.18	\$ 629.27
13 KI-ARMSTRONG - DOCK	10,471	4,362,850	\$ 188,258.11	\$ 152,699.75	\$ 340,957.86	\$ 2,121.52
14 KI-ARMSTRONG - EQUALITY	2,999	1,246,170	\$ 53,919.02	\$ 43,615.95	\$ 97,534.97	\$ -
15 KI-ARMSTRONG - LEWIS	3,500	1,147,820	\$ 62,926.50	\$ 40,173.70	\$ 103,100.20	\$ -
16 KI-ARMSTRONG - MIDWAY	5,012	2,702,540	\$ 90,110.75	\$ 94,588.90	\$ 184,699.65	\$ -
17 KI-DOMTAR PAPER CO.	15,000	9,807,456	\$ 269,685.00	\$ 343,260.96	\$ 612,945.96	\$ -
18 KI-DOTIKI #3	66	27,720	\$ 1,186.61	\$ 970.20	\$ 2,156.81	\$ 35.96
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	750	454,570	\$ 13,484.25	\$ 15,909.95	\$ 29,394.20	\$ -
20 KI-HOPKINS CO. COAL	113	61,230	\$ 2,031.63	\$ 2,143.05	\$ 4,174.68	\$ 89.90
21 KI-KIMBERLY-CLARK	37,973	24,092,730	\$ 682,716.57	\$ 843,245.55	\$ 1,525,962.12	\$ -
22 KI-PATRIOT COAL, LP			\$ -	\$ -	\$ -	\$ -
23 KI-PENNYRILE ENERGY, LLC	3,000	167,660	\$ 53,937.00	\$ 5,868.10	\$ 59,805.10	\$ -
24 KI-PRECOAT	3,659	1,435,230	\$ 65,785.16	\$ 50,233.05	\$ 116,018.21	\$ -
25 KI-SEBREE MINING-KMMC	148	67,150	\$ 2,660.89	\$ 2,350.25	\$ 5,011.14	\$ -
26 KI-SEBREE MINING-STEAMPORT-ALLIED	7,137	2,824,070	\$ 128,316.12	\$ 98,842.45	\$ 227,158.57	\$ -
27 KI-SOUTHWIRE CO.	6,418	3,559,820	\$ 115,389.22	\$ 124,593.70	\$ 239,982.92	\$ -
28 KI-TYSON FOODS	10,128	5,283,510	\$ 182,091.31	\$ 184,922.85	\$ 367,014.16	\$ -
29 KI-VALLEY GRAIN	2,198	1,060,210	\$ 39,517.84	\$ 37,107.35	\$ 76,625.19	\$ 4,944.23
30						
31 SUBTOTAL INDUSTRIALS	143,876	75,086,656	\$ 2,586,746.60	\$ 2,628,032.96	\$ 5,214,779.56	\$ 9,025.47
32						
33 JPI-SHELL OIL	1,966	437,440	\$ 35,346.71	\$ 15,310.40	\$ 50,657.11	\$ -
34						
35 TOTAL INDUSTRIALS	145,842	75,524,096	\$ 2,622,093.31	\$ 2,643,343.36	\$ 5,265,436.67	\$ 9,025.47
36						
37						
38 GRAND TOTAL	688,107	307,772,493	\$ 16,038,813.95	\$ 10,772,037.26	\$ 26,810,851.21	\$ 9,025.47

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
February 2014**

	BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FUEL ADJUSTMENT CLAUSE \$	FAC MILLS/ KWH
1 FEBRUARY 2014						
2						
3 JP RURALS	\$ -	\$ 5,777,950.70	\$ 10.00	\$ 5,777,960.70	\$ 344,324.94	5.42
4 KENERGY RURALS	\$ -	\$ 10,916,002.82	\$ -	\$ 10,916,002.82	\$ 638,973.06	5.42
5 MEADE CO. RURALS	\$ -	\$ 4,851,461.02	\$ -	\$ 4,851,461.02	\$ 275,256.07	5.42
6						
7 TOTAL RURALS	\$ -	\$ 21,545,414.54	\$ 10.00	\$ 21,545,424.54	\$ 1,258,554.07	5.42
8						
9 KI-ACCURIDE	\$ -	\$ 156,788.84		\$ 156,788.84	\$ 10,574.20	5.42
10 KI-ALCOA	\$ -	\$ 3,905.12		\$ 3,905.12	\$ 223.26	5.42
11 KI-ALERIS	\$ -	\$ 1,004,410.27		\$ 1,004,410.27	\$ 76,703.13	5.42
12 KI-AMG ALUMINUM NORTH AMERICA	\$ -	\$ 58,967.45		\$ 58,967.45	\$ 3,462.31	5.42
13 KI-ARMSTRONG - DOCK	\$ 11,719.78	\$ 354,799.16		\$ 354,799.16	\$ 23,642.28	5.42
14 KI-ARMSTRONG - EQUALITY	\$ 3,853.69	\$ 101,388.66		\$ 101,388.66	\$ 6,753.00	5.42
15 KI-ARMSTRONG - LEWIS	\$ 6,009.26	\$ 109,109.46		\$ 109,109.46	\$ 6,220.04	5.42
16 KI-ARMSTRONG - MIDWAY	\$ -	\$ 184,699.65		\$ 184,699.65	\$ 14,645.06	5.42
17 KI-DOMTAR PAPER CO.	\$ -	\$ 612,945.96		\$ 612,945.96	\$ 53,146.60	5.42
18 KI-DOTIKI #3	\$ -	\$ 2,192.77		\$ 2,192.77	\$ 150.21	5.42
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ -	\$ 29,394.20		\$ 29,394.20	\$ 2,463.31	5.42
20 KI-HOPKINS CO. COAL	\$ -	\$ 4,264.58		\$ 4,264.58	\$ 331.81	5.42
21 KI-KIMBERLY-CLARK	\$ -	\$ 1,525,962.12		\$ 1,525,962.12	\$ 130,558.50	5.42
22 KI-PATRIOT COAL, LP	\$ -	\$ -		\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ -	\$ 59,805.10		\$ 59,805.10	\$ 908.55	5.42
24 KI-PRECOAT	\$ -	\$ 116,018.21		\$ 116,018.21	\$ 7,777.51	5.42
25 KI-SEBREE MINING-KMMC	\$ -	\$ 5,011.14		\$ 5,011.14	\$ 363.89	5.42
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ -	\$ 227,158.57		\$ 227,158.57	\$ 15,303.64	5.42
27 KI-SOUTHWIRE CO.	\$ -	\$ 239,982.92		\$ 239,982.92	\$ 19,290.66	5.42
28 KI-TYSON FOODS	\$ -	\$ 367,014.16		\$ 367,014.16	\$ 28,631.34	5.42
29 KI-VALLEY GRAIN	\$ -	\$ 81,569.42		\$ 81,569.42	\$ 5,745.28	5.42
30						
31 SUBTOTAL INDUSTRIALS	\$ 21,582.73	\$ 5,245,387.76	\$ -	\$ 5,245,387.76	\$ 406,894.58	5.42
32						
33 JPI-SHELL OIL	\$ -	\$ 50,657.11		\$ 50,657.11	\$ 2,370.49	5.42
34						
35 TOTAL INDUSTRIALS	\$ 21,582.73	\$ 5,296,044.87	\$ -	\$ 5,296,044.87	\$ 409,265.07	5.42
36						
37						
38 GRAND TOTAL	\$ 21,582.73	\$ 26,841,459.41	\$ 10.00	\$ 26,841,469.41	\$ 1,667,819.14	5.42

Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
February 2014

	ES \$	ES MILLS/ KWH	UNWIND SURCREDIT (US) \$	US MILLS/ KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
1 FEBRUARY 2014							
2							
3 JP RURALS	\$ 263,353.44	4.14	\$ (14,296.57)	(0.23)	\$ (24,717.18)	\$ -	(0.39)
4 KENERGY RURALS	\$ 494,765.42	4.20	\$ (26,530.53)	(0.23)	\$ (45,868.34)	\$ -	(0.39)
5 MEADE CO. RURALS	\$ 217,793.23	4.29	\$ (11,428.79)	(0.22)	\$ (19,759.11)	\$ -	(0.39)
6							
7 TOTAL RURALS	\$ 975,912.09	4.20	\$ (52,255.89)	(0.23)	\$ (90,344.63)	\$ -	(0.39)
8							
9 KI-ACCURIDE	\$ 7,250.25	3.72	\$ (439.05)	(0.23)	\$ (759.06)	\$ -	(0.39)
10 KI-ALCOA	\$ 131.32	3.19	\$ (9.27)	(0.23)	\$ (16.03)	\$ -	(0.39)
11 KI-ALERIS	\$ 47,849.50	3.38	\$ (3,184.76)	(0.23)	\$ (5,506.09)	\$ -	(0.39)
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 2,623.76	4.11	\$ (143.76)	(0.23)	\$ (248.54)	\$ -	(0.39)
13 KI-ARMSTRONG - DOCK	\$ 15,867.97	3.64	\$ (981.64)	(0.22)	\$ (1,697.15)	\$ -	(0.39)
14 KI-ARMSTRONG - EQUALITY	\$ 4,537.63	3.64	\$ (280.39)	(0.23)	\$ (484.76)	\$ -	(0.39)
15 KI-ARMSTRONG - LEWIS	\$ 4,652.77	4.05	\$ (258.26)	(0.23)	\$ (446.50)	\$ -	(0.39)
16 KI-ARMSTRONG - MIDWAY	\$ 8,883.56	3.29	\$ (608.07)	(0.22)	\$ (1,051.29)	\$ -	(0.39)
17 KI-DOMTAR PAPER CO.	\$ 30,192.75	3.08	\$ (2,206.68)	(0.23)	\$ (3,815.10)	\$ -	(0.39)
18 KI-DOTIKI #3	\$ 100.48	3.62	\$ (6.24)	(0.23)	\$ (10.78)	\$ -	(0.39)
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 1,434.55	3.16	\$ (102.28)	(0.23)	\$ (176.83)	\$ -	(0.39)
20 KI-HOPKINS CO. COAL	\$ 200.92	3.28	\$ (13.78)	(0.23)	\$ (23.82)	\$ -	(0.39)
21 KI-KIMBERLY-CLARK	\$ 74,892.03	3.11	\$ (5,420.86)	(0.22)	\$ (9,372.07)	\$ -	(0.39)
22 KI-PATRIOT COAL, LP	\$ -	0.00	\$ -	0.00	\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 2,276.26	13.58	\$ (37.72)	(0.22)	\$ (65.22)	\$ -	(0.39)
24 KI-PRECOAT	\$ 5,357.57	3.73	\$ (322.93)	(0.23)	\$ (558.30)	\$ -	(0.39)
25 KI-SEBREE MINING-KMMC	\$ 235.79	3.51	\$ (15.11)	(0.23)	\$ (26.12)	\$ -	(0.39)
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 10,501.73	3.72	\$ (635.42)	(0.23)	\$ (1,098.56)	\$ -	(0.39)
27 KI-SOUTHWIRE CO.	\$ 11,583.58	3.25	\$ (800.96)	(0.23)	\$ (1,384.77)	\$ -	(0.39)
28 KI-TYSON FOODS	\$ 17,578.87	3.33	\$ (1,188.79)	(0.23)	\$ (2,055.29)	\$ -	(0.39)
29 KI-VALLEY GRAIN	\$ 3,633.73	3.43	\$ (238.55)	(0.23)	\$ (412.42)	\$ -	(0.39)
30							
31 SUBTOTAL INDUSTRIALS	\$ 249,785.02	3.33	\$ (16,894.52)	(0.23)	\$ (29,208.70)	\$ -	(0.39)
32							
33 JPI-SHELL OIL	\$ 2,178.73	4.98	\$ (98.42)	(0.22)	\$ (170.16)	\$ -	(0.39)
34							
35 TOTAL INDUSTRIALS	\$ 251,963.75	3.34	\$ (16,992.94)	(0.23)	\$ (29,378.86)	\$ -	(0.39)
36							
37							
38 GRAND TOTAL	\$ 1,227,875.84	3.99	\$ (69,248.83)	(0.23)	\$ (119,723.49)	\$ -	(0.39)

Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
February 2014

	REVENUE \$	REVENUE MILLS/ KWH	MRS M \$	MRS M MILLS/ KWH	CN 2013-00199 MRS M TO OFF- SET BASE RATE INCREASE	MRS M - BASE RATE CREDIT MILLS/ KWH	REVENUE \$ NET OF MRS M AND BASE RATE CREDIT \$	REV NET OF MRS M AND BASE RATE CREDIT MILLS/ KWH
1 FEBRUARY 2014								
2								
3 JP RURALS	\$ 6,346,625.33	99.88	\$ (797,473.29)	(12.55)	(1,699,021.23)	(26.74)	\$ 3,850,130.81	60.59
4 KENERGY RURALS	\$ 11,977,342.43	101.58	\$ (1,485,945.99)	(12.60)	(3,245,520.41)	(27.52)	\$ 7,245,876.03	61.45
5 MEADE CO. RURALS	\$ 5,313,322.42	104.60	\$ (644,772.84)	(12.69)	(1,469,368.79)	(28.93)	\$ 3,199,180.79	62.98
6								
7 TOTAL RURALS	\$ 23,637,290.18	101.78	\$ (2,928,192.12)	(12.61)	(6,413,910.43)	(27.62)	\$ 14,295,187.63	61.55
8								
9 KI-ACCURIDE	\$ 173,415.18	88.87	\$ (23,653.04)	(12.12)	(45,510.01)	(23.32)	\$ 104,252.13	53.43
10 KI-ALCOA	\$ 4,234.40	102.78	\$ (477.64)	(11.59)	(714.48)	(17.34)	\$ 3,042.28	73.84
11 KI-ALERIS	\$ 1,120,272.05	79.15	\$ (166,832.06)	(11.79)	(276,423.50)	(19.53)	\$ 677,016.49	47.83
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 64,661.22	101.20	\$ (7,994.52)	(12.51)	(17,729.86)	(27.75)	\$ 38,936.84	60.94
13 KI-ARMSTRONG - DOCK	\$ 391,630.62	89.76	\$ (52,542.08)	(12.04)	(97,875.59)	(22.43)	\$ 241,212.95	55.29
14 KI-ARMSTRONG - EQUALITY	\$ 111,914.14	89.81	\$ (15,012.94)	(12.05)	(28,015.58)	(22.48)	\$ 68,885.62	55.28
15 KI-ARMSTRONG - LEWIS	\$ 119,277.51	103.92	\$ (14,301.35)	(12.46)	(31,163.10)	(27.15)	\$ 73,813.06	64.31
16 KI-ARMSTRONG - MIDWAY	\$ 206,568.91	76.44	\$ (31,601.11)	(11.69)	(49,919.87)	(18.47)	\$ 125,047.93	46.27
17 KI-DOMTAR PAPER CO.	\$ 690,263.53	70.38	\$ (112,634.22)	(11.48)	(157,997.28)	(16.11)	\$ 419,632.03	42.79
18 KI-DOTIKI #3	\$ 2,426.44	87.53	\$ (333.49)	(12.03)	(618.02)	(22.30)	\$ 1,474.93	53.21
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 33,012.95	72.62	\$ (5,255.66)	(11.56)	(7,720.85)	(16.98)	\$ 20,036.44	44.08
20 KI-HOPKINS CO. COAL	\$ 4,759.71	77.73	\$ (715.62)	(11.69)	(1,126.98)	(18.41)	\$ 2,917.11	47.64
21 KI-KIMBERLY-CLARK	\$ 1,716,619.72	71.25	\$ (277,415.52)	(11.51)	(396,299.52)	(16.45)	\$ 1,042,904.68	43.29
22 KI-PATRIOT COAL, LP	\$ -	-	\$ -	0.00	0.00	0.00	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 62,886.97	375.09	\$ (3,685.61)	(21.98)	(22,630.30)	(134.98)	\$ 36,571.06	218.13
24 KI-PRECOAT	\$ 128,272.06	89.37	\$ (17,422.11)	(12.14)	(33,755.12)	(23.52)	\$ 77,094.83	53.72
25 KI-SEBREE MINING-KMMC	\$ 5,569.59	82.94	\$ (800.26)	(11.92)	(1,410.82)	(21.01)	\$ 3,358.51	50.02
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 251,229.96	88.96	\$ (34,240.86)	(12.12)	(65,963.51)	(23.36)	\$ 151,025.59	53.48
27 KI-SOUTHWIRE CO.	\$ 268,671.43	75.47	\$ (41,507.42)	(11.66)	(64,419.45)	(18.10)	\$ 162,744.56	45.72
28 KI-TYSON FOODS	\$ 409,980.29	77.60	\$ (61,992.05)	(11.73)	(99,987.34)	(18.92)	\$ 248,000.90	46.94
29 KI-VALLEY GRAIN	\$ 90,297.46	85.17	\$ (12,545.85)	(11.83)	(21,267.32)	(20.06)	\$ 56,484.29	53.28
30								
31 SUBTOTAL INDUSTRIALS	\$ 5,855,964.14	77.99	\$ (880,963.41)	(11.73)	(1,420,548.50)	(18.92)	\$ 3,554,452.23	47.34
32								
33 JPI-SHELL OIL	\$ 54,937.75	125.59	\$ (5,855.86)	(13.39)	(16,468.22)	(37.65)	\$ 32,613.67	74.56
34								
35 TOTAL INDUSTRIALS	\$ 5,910,901.89	78.27	\$ (886,819.27)	(11.74)	(1,437,016.72)	(19.03)	\$ 3,587,065.90	47.50
36								
37								
38 GRAND TOTAL	\$ 29,548,192.07	96.01	\$ (3,815,011.39)	(12.40)	\$ (7,850,927.15)	(25.51)	\$ 17,882,253.53	58.10

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
March 2014**

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$
1 MARCH 2014						
2						
3 JP RURALS	125,221	56,751,900	\$ 3,098,217.98	\$ 1,986,316.50	\$ 5,084,534.48	\$ -
4 KENERGY RURALS	230,823	103,944,390	\$ 5,711,022.67	\$ 3,638,053.65	\$ 9,349,076.32	\$ -
5 MEADE CO. RURALS	104,330	43,762,970	\$ 2,581,332.86	\$ 1,531,703.95	\$ 4,113,036.81	\$ -
6						
7 TOTAL RURALS	460,374	204,459,260	\$ 11,390,573.51	\$ 7,156,074.10	\$ 18,546,647.61	\$ -
8						
9 KI-ACCURIDE	5,050	2,145,500	\$ 90,793.95	\$ 75,092.50	\$ 165,886.45	\$ -
10 KI-ALCOA	78	45,320	\$ 1,402.36	\$ 1,586.20	\$ 2,988.56	\$ 1,402.36
11 KI-ALERIS	27,603	16,311,490	\$ 496,274.34	\$ 570,902.15	\$ 1,067,176.49	\$ -
12 KI-AMG ALUMINUM NORTH AMERICA	2,001	673,600	\$ 35,975.98	\$ 23,576.00	\$ 59,551.98	\$ -
13 KI-ARMSTRONG - DOCK	10,319	4,750,170	\$ 185,525.30	\$ 166,255.95	\$ 351,781.25	\$ -
14 KI-ARMSTRONG - EQUALITY	3,125	1,534,840	\$ 56,184.38	\$ 53,719.40	\$ 109,903.78	\$ -
15 KI-ARMSTRONG - LEWIS	3,500	1,254,720	\$ 62,926.50	\$ 43,915.20	\$ 106,841.70	\$ -
16 KI-ARMSTRONG - MIDWAY	4,879	2,837,530	\$ 87,719.54	\$ 99,313.55	\$ 187,033.09	\$ -
17 KI-DOMTAR PAPER CO.	15,000	10,961,456	\$ 269,685.00	\$ 383,650.96	\$ 653,335.96	\$ -
18 KI-DOTIKI #3	73	28,470	\$ 1,312.47	\$ 996.45	\$ 2,308.92	\$ 53.94
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	750	507,540	\$ 13,484.25	\$ 17,763.90	\$ 31,248.15	\$ -
20 KI-HOPKINS CO. COAL	126	53,890	\$ 2,265.35	\$ 1,886.15	\$ 4,151.50	\$ -
21 KI-KIMBERLY-CLARK	37,454	25,743,990	\$ 673,385.47	\$ 901,039.65	\$ 1,574,425.12	\$ -
22 KI-PATRIOT COAL, LP			\$ -	\$ -	\$ -	\$ -
23 KI-PENNYRILE ENERGY, LLC	3,000	180,030	\$ 53,937.00	\$ 6,301.05	\$ 60,238.05	\$ -
24 KI-PRECOAT	3,531	1,554,600	\$ 63,483.85	\$ 54,411.00	\$ 117,894.85	\$ -
25 KI-SEBREE MINING-KMMC	158	66,720	\$ 2,840.68	\$ 2,335.20	\$ 5,175.88	\$ -
26 KI-SEBREE MINING-STEAMPORT-ALLIED	7,176	2,824,400	\$ 129,017.30	\$ 98,854.00	\$ 227,871.30	\$ -
27 KI-SOUTHWIRE CO.	7,280	3,903,950	\$ 130,887.12	\$ 136,638.25	\$ 267,525.37	\$ -
28 KI-TYSON FOODS	10,355	5,774,720	\$ 186,172.55	\$ 202,115.20	\$ 388,287.75	\$ -
29 KI-VALLEY GRAIN	2,160	1,181,260	\$ 38,834.64	\$ 41,344.10	\$ 80,178.74	\$ 5,411.68
30						
31 SUBTOTAL INDUSTRIALS	143,618	82,334,196	\$ 2,582,108.03	\$ 2,881,696.86	\$ 5,463,804.89	\$ 6,867.98
32						
33 JPI-SHELL OIL	1,922	482,660	\$ 34,555.64	\$ 16,893.10	\$ 51,448.74	\$ -
34						
35 TOTAL INDUSTRIALS	145,540	82,816,856	\$ 2,616,663.67	\$ 2,898,589.96	\$ 5,515,253.63	\$ 6,867.98
36						
37						
38 GRAND TOTAL	605,914	287,276,116	\$ 14,007,237.18	\$ 10,054,664.06	\$ 24,061,901.24	\$ 6,867.98

Case No. 2014-00230

Attachment for Response to Staff Item 6

Witness: Nicholas R. Castlen

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Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
March 2014

	BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FUEL ADJUSTMENT CLAUSE \$	FAC MILLS/ KWH
1 MARCH 2014						
2						
3 JP RURALS	\$ -	\$ 5,084,534.48	\$ 10.00	\$ 5,084,544.48	\$ 446,977.96	7.88
4 KENERGY RURALS	\$ -	\$ 9,349,076.32	\$ -	\$ 9,349,076.32	\$ 818,666.02	7.88
5 MEADE CO. RURALS	\$ -	\$ 4,113,036.81	\$ -	\$ 4,113,036.81	\$ 344,677.15	7.88
6						
7 TOTAL RURALS	\$ -	\$ 18,546,647.61	\$ 10.00	\$ 18,546,657.61	\$ 1,610,321.13	7.88
8						
9 KI-ACCURIDE	\$ -	\$ 165,886.45		\$ 165,886.45	\$ 16,897.96	7.88
10 KI-ALCOA	\$ -	\$ 4,390.92		\$ 4,390.92	\$ 356.94	7.88
11 KI-ALERIS	\$ -	\$ 1,067,176.49		\$ 1,067,176.49	\$ 128,469.30	7.88
12 KI-AMG ALUMINUM NORTH AMERICA	\$ -	\$ 59,551.98		\$ 59,551.98	\$ 5,305.27	7.88
13 KI-ARMSTRONG - DOCK	\$ 10,911.87	\$ 362,693.12		\$ 362,693.12	\$ 37,412.34	7.88
14 KI-ARMSTRONG - EQUALITY	\$ 3,386.30	\$ 113,290.08		\$ 113,290.08	\$ 12,088.40	7.88
15 KI-ARMSTRONG - LEWIS	\$ 2,673.82	\$ 109,515.52		\$ 109,515.52	\$ 9,882.17	7.88
16 KI-ARMSTRONG - MIDWAY	\$ -	\$ 187,033.09		\$ 187,033.09	\$ 22,348.39	7.88
17 KI-DOMTAR PAPER CO.	\$ -	\$ 653,335.96		\$ 653,335.96	\$ 86,332.43	7.88
18 KI-DOTIKI #3	\$ -	\$ 2,362.86		\$ 2,362.86	\$ 224.23	7.88
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ -	\$ 31,248.15		\$ 31,248.15	\$ 3,997.39	7.88
20 KI-HOPKINS CO. COAL	\$ -	\$ 4,151.50		\$ 4,151.50	\$ 424.44	7.88
21 KI-KIMBERLY-CLARK	\$ -	\$ 1,574,425.12		\$ 1,574,425.12	\$ 202,759.67	7.88
22 KI-PATRIOT COAL, LP	\$ -	\$ -		\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ -	\$ 60,238.05		\$ 60,238.05	\$ 1,417.92	7.88
24 KI-PRECOAT	\$ -	\$ 117,894.85		\$ 117,894.85	\$ 12,244.03	7.88
25 KI-SEBREE MINING-KMMC	\$ -	\$ 5,175.88		\$ 5,175.88	\$ 525.49	7.88
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ -	\$ 227,871.30		\$ 227,871.30	\$ 22,244.97	7.88
27 KI-SOUTHWIRE CO.	\$ -	\$ 267,525.37		\$ 267,525.37	\$ 30,747.51	7.88
28 KI-TYSON FOODS	\$ -	\$ 388,287.75		\$ 388,287.75	\$ 45,481.69	7.88
29 KI-VALLEY GRAIN	\$ -	\$ 85,590.42		\$ 85,590.42	\$ 9,303.60	7.88
30						
31 SUBTOTAL INDUSTRIALS	\$ 16,971.99	\$ 5,487,644.86	\$ -	\$ 5,487,644.86	\$ 648,464.14	7.88
32						
33 JPI-SHELL OIL	\$ -	\$ 51,448.74		\$ 51,448.74	\$ 3,801.43	7.88
34						
35 TOTAL INDUSTRIALS	\$ 16,971.99	\$ 5,539,093.60	\$ -	\$ 5,539,093.60	\$ 652,265.57	7.88
36						
37						
38 GRAND TOTAL	\$ 16,971.99	\$ 24,085,741.21	\$ 10.00	\$ 24,085,751.21	\$ 2,262,586.70	7.88

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**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
March 2014**

	ES \$	ES MILLS/ KWH	UNWIND SURCREDIT (US) \$	US MILLS/ KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
1 MARCH 2014							
2							
3 JP RURALS	\$ 123,239.66	2.17	\$ (12,769.18)	(0.23)	\$ (22,076.49)	\$ -	(0.39)
4 KENERGY RURALS	\$ 226,302.72	2.18	\$ (23,387.49)	(0.23)	\$ (40,434.37)	\$ -	(0.39)
5 MEADE CO. RURALS	\$ 98,102.77	2.24	\$ (9,846.67)	(0.23)	\$ (17,023.80)	\$ -	(0.39)
6							
7 TOTAL RURALS	\$ 447,645.15	2.19	\$ (46,003.34)	(0.23)	\$ (79,534.66)	\$ -	(0.39)
8							
9 KI-ACCURIDE	\$ 4,116.00	1.92	\$ (482.74)	(0.23)	\$ (834.60)	\$ -	(0.39)
10 KI-ALCOA	\$ 77.54	1.71	\$ (10.20)	(0.23)	\$ (17.63)	\$ -	(0.39)
11 KI-ALERIS	\$ 27,755.31	1.70	\$ (3,670.09)	(0.23)	\$ (6,345.17)	\$ -	(0.39)
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 1,428.46	2.12	\$ (151.56)	(0.23)	\$ (262.03)	\$ -	(0.39)
13 KI-ARMSTRONG - DOCK	\$ 8,830.38	1.86	\$ (1,068.79)	(0.23)	\$ (1,847.82)	\$ -	(0.39)
14 KI-ARMSTRONG - EQUALITY	\$ 2,784.63	1.81	\$ (345.34)	(0.23)	\$ (597.05)	\$ -	(0.39)
15 KI-ARMSTRONG - LEWIS	\$ 2,586.30	2.06	\$ (282.31)	(0.22)	\$ (488.09)	\$ -	(0.39)
16 KI-ARMSTRONG - MIDWAY	\$ 4,853.60	1.71	\$ (638.44)	(0.22)	\$ (1,103.80)	\$ -	(0.39)
17 KI-DOMTAR PAPER CO.	\$ 17,488.27	1.60	\$ (2,466.33)	(0.23)	\$ (4,264.01)	\$ -	(0.39)
18 KI-DOTIKI #3	\$ 56.58	1.99	\$ (6.41)	(0.23)	\$ (11.07)	\$ -	(0.39)
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 827.93	1.63	\$ (114.20)	(0.23)	\$ (197.43)	\$ -	(0.39)
20 KI-HOPKINS CO. COAL	\$ 103.11	1.91	\$ (12.13)	(0.23)	\$ (20.96)	\$ -	(0.39)
21 KI-KIMBERLY-CLARK	\$ 41,802.21	1.62	\$ (5,792.40)	(0.23)	\$ (10,014.41)	\$ -	(0.39)
22 KI-PATRIOT COAL, LP	\$ -	0.00	\$ -	0.00	\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 1,189.89	6.61	\$ (40.51)	(0.23)	\$ (70.03)	\$ -	(0.39)
24 KI-PRECOAT	\$ 2,940.38	1.89	\$ (349.79)	(0.23)	\$ (604.74)	\$ -	(0.39)
25 KI-SEBREE MINING-KMMC	\$ 128.31	1.92	\$ (15.01)	(0.22)	\$ (25.95)	\$ -	(0.39)
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 5,591.51	1.98	\$ (635.49)	(0.23)	\$ (1,098.69)	\$ -	(0.39)
27 KI-SOUTHWIRE CO.	\$ 6,863.69	1.76	\$ (878.39)	(0.23)	\$ (1,518.64)	\$ -	(0.39)
28 KI-TYSON FOODS	\$ 10,017.19	1.73	\$ (1,299.31)	(0.22)	\$ (2,246.37)	\$ -	(0.39)
29 KI-VALLEY GRAIN	\$ 2,062.79	1.75	\$ (265.78)	(0.22)	\$ (459.51)	\$ -	(0.39)
30							
31 SUBTOTAL INDUSTRIALS	\$ 141,504.08	1.72	\$ (18,525.22)	(0.23)	\$ (32,028.00)	\$ -	(0.39)
32							
33 JPI-SHELL OIL	\$ 1,183.58	2.45	\$ (108.60)	(0.23)	\$ (187.75)	\$ -	(0.39)
34							
35 TOTAL INDUSTRIALS	\$ 142,687.66	1.72	\$ (18,633.82)	(0.23)	\$ (32,215.75)	\$ -	(0.39)
36							
37							
38 GRAND TOTAL	\$ 590,332.81	2.05	\$ (64,637.16)	(0.23)	\$ (111,750.41)	\$ -	(0.39)

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
March 2014**

	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	CN 2013-00199 MRSM TO OFF- SET BASE RATE INCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	REVENUE \$ NET OF MRSM \$ AND BASE RATE CREDIT	REV NET OF MRSM AND BASE RATE CREDIT MILLS/ KWH
1 MARCH 2014								
2								
3 JP RURALS	\$ 5,619,916.43	99.03	\$ (739,735.54)	(13.03)	(1,481,113.99)	(26.10)	\$ 3,399,066.90	59.89
4 KENERGY RURALS	\$ 10,330,223.20	99.38	\$ (1,355,450.63)	(13.04)	(2,730,174.45)	(26.27)	\$ 6,244,598.12	60.08
5 MEADE CO. RURALS	\$ 4,528,946.26	103.49	\$ (573,499.91)	(13.10)	(1,234,015.24)	(28.20)	\$ 2,721,431.11	62.19
6								
7 TOTAL RURALS	\$ 20,479,085.89	100.16	\$ (2,668,686.08)	(13.05)	(5,445,303.68)	(26.63)	\$ 12,365,096.13	60.48
8								
9 KI-ACCURIDE	\$ 185,583.07	86.50	\$ (27,422.57)	(12.78)	(47,410.70)	(22.10)	\$ 110,749.80	51.62
10 KI-ALCOA	\$ 4,797.57	105.86	\$ (569.85)	(12.57)	(793.19)	(17.50)	\$ 3,434.53	75.78
11 KI-ALERIS	\$ 1,213,385.84	74.39	\$ (204,947.03)	(12.56)	(282,065.64)	(17.29)	\$ 726,373.17	44.53
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 65,872.12	97.79	\$ (8,745.77)	(12.98)	(17,903.26)	(26.58)	\$ 39,223.09	58.23
13 KI-ARMSTRONG - DOCK	\$ 406,019.23	85.47	\$ (60,431.48)	(12.72)	(98,708.06)	(20.78)	\$ 246,879.69	51.97
14 KI-ARMSTRONG - EQUALITY	\$ 127,220.72	82.89	\$ (19,457.60)	(12.68)	(30,374.20)	(19.79)	\$ 77,388.92	50.42
15 KI-ARMSTRONG - LEWIS	\$ 121,213.59	96.61	\$ (16,216.32)	(12.92)	(31,697.60)	(25.26)	\$ 73,299.67	58.42
16 KI-ARMSTRONG - MIDWAY	\$ 212,492.84	74.89	\$ (35,677.70)	(12.57)	(49,628.70)	(17.49)	\$ 127,186.44	44.82
17 KI-DOMTAR PAPER CO.	\$ 750,426.32	68.46	\$ (136,562.57)	(12.46)	(163,767.28)	(14.94)	\$ 450,096.47	41.06
18 KI-DOTIKI #3	\$ 2,626.19	92.24	\$ (365.85)	(12.85)	(672.62)	(23.63)	\$ 1,587.72	55.77
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 35,761.84	70.46	\$ (6,341.34)	(12.49)	(7,985.70)	(15.73)	\$ 21,434.80	42.23
20 KI-HOPKINS CO. COAL	\$ 4,645.96	86.21	\$ (688.51)	(12.78)	(1,184.71)	(21.98)	\$ 2,772.74	51.45
21 KI-KIMBERLY-CLARK	\$ 1,803,180.19	70.04	\$ (321,459.18)	(12.49)	(400,785.81)	(15.57)	\$ 1,080,935.20	41.99
22 KI-PATRIOT COAL, LP	\$ -	-	\$ -	0.00		0.00	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 62,735.32	348.47	\$ (3,145.56)	(17.47)	(22,692.15)	(126.05)	\$ 36,897.61	204.95
24 KI-PRECOAT	\$ 132,124.73	84.99	\$ (19,828.00)	(12.75)	(33,422.18)	(21.50)	\$ 78,874.55	50.74
25 KI-SEBREE MINING-KMMC	\$ 5,788.72	86.76	\$ (853.09)	(12.79)	(1,481.31)	(22.20)	\$ 3,454.32	51.77
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 253,973.60	89.92	\$ (36,272.96)	(12.84)	(66,248.46)	(23.46)	\$ 151,452.18	53.62
27 KI-SOUTHWIRE CO.	\$ 302,739.54	77.55	\$ (49,272.30)	(12.62)	(72,401.67)	(18.55)	\$ 181,065.57	46.38
28 KI-TYSON FOODS	\$ 440,240.95	76.24	\$ (72,747.97)	(12.60)	(104,092.32)	(18.03)	\$ 263,400.66	45.61
29 KI-VALLEY GRAIN	\$ 96,231.52	81.47	\$ (14,894.82)	(12.61)	(21,596.54)	(18.28)	\$ 59,740.16	50.57
30								
31 SUBTOTAL INDUSTRIALS	\$ 6,227,059.86	75.63	\$ (1,035,900.47)	(12.58)	(1,454,912.10)	(17.67)	\$ 3,736,247.29	45.38
32								
33 JPI-SHELL OIL	\$ 56,137.40	116.31	\$ (6,426.71)	(13.32)	(16,374.71)	(33.93)	\$ 33,335.98	69.07
34								
35 TOTAL INDUSTRIALS	\$ 6,283,197.26	75.87	\$ (1,042,327.18)	(12.59)	(1,471,286.81)	(17.77)	\$ 3,769,583.27	45.52
36								
37								
38 GRAND TOTAL	\$ 26,762,283.15	93.16	\$ (3,711,013.26)	(12.92)	\$ (6,916,590.49)	(24.08)	\$ 16,134,679.40	56.16

**Big Rivers Electric Corporation
Monthly Billing Summary
Electric Utility Sales
April 2014**

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$
1 APRIL 2014						
2						
3 JP RURALS	91,784	41,851,204	\$ 1,267,078.12	\$ 1,883,304.18	\$ 3,150,382.30	\$ -
4 KENERGY RURALS	173,212	75,146,502	\$ 2,391,191.66	\$ 3,381,592.59	\$ 5,772,784.25	\$ -
5 MEADE CO. RURALS	76,410	28,978,120	\$ 1,054,840.05	\$ 1,304,015.40	\$ 2,358,855.45	\$ -
6						
7 TOTAL RURALS	341,406	145,975,826	\$ 4,713,109.83	\$ 6,568,912.17	\$ 11,282,022.00	\$ -
8						
9 KI-ACCURIDE	5,209	2,128,210	\$ 55,814.44	\$ 80,978.39	\$ 136,792.83	\$ -
10 KI-ALCOA	83	46,010	\$ 889.35	\$ 1,750.68	\$ 2,640.03	\$ 782.20
11 KI-ALERIS	27,328	15,440,730	\$ 292,819.52	\$ 587,519.78	\$ 880,339.30	\$ -
12 KI-AMG ALUMINUM NORTH AMERICA	2,001	600,370	\$ 21,440.72	\$ 22,844.08	\$ 44,284.80	\$ -
13 KI-ARMSTRONG - DOCK	9,645	4,342,330	\$ 103,346.18	\$ 165,225.66	\$ 268,571.84	\$ -
14 KI-ARMSTRONG - EQUALITY	3,068	1,416,730	\$ 32,873.62	\$ 53,906.58	\$ 86,780.20	\$ -
15 KI-ARMSTRONG - LEWIS	3,188	1,238,210	\$ 34,159.42	\$ 47,113.89	\$ 81,273.31	\$ 385.74
16 KI-ARMSTRONG - MIDWAY	4,914	2,519,070	\$ 52,653.51	\$ 95,850.61	\$ 148,504.12	\$ 589.33
17 KI-DOMTAR PAPER CO.	15,000	10,746,598	\$ 160,725.00	\$ 408,908.05	\$ 569,633.05	\$ -
18 KI-DOTIKI #3	63	24,920	\$ 675.05	\$ 948.21	\$ 1,623.26	\$ 75.01
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	762	511,720	\$ 8,164.83	\$ 19,470.95	\$ 27,635.78	\$ 278.59
20 KI-HOPKINS CO. COAL	101	31,620	\$ 1,082.22	\$ 1,203.14	\$ 2,285.36	\$ 10.72
21 KI-KIMBERLY-CLARK	38,016	23,869,590	\$ 407,341.44	\$ 908,237.90	\$ 1,315,579.34	\$ -
22 KI-PATRIOT COAL, LP	25,374	0	\$ -	\$ 266,423.87	\$ 266,423.87	\$ -
23 KI-PENNYRILE ENERGY, LLC	6,000	195,700	\$ 64,290.00	\$ 7,446.39	\$ 71,736.39	\$ -
24 KI-PRECOAT	3,440	1,424,860	\$ 36,859.60	\$ 54,215.92	\$ 91,075.52	\$ -
25 KI-SEBREE MINING-KMMC	142	46,500	\$ 1,521.53	\$ 1,769.33	\$ 3,290.86	\$ -
26 KI-SEBREE MINING-STEAMPORT-ALLIED	6,989	2,592,480	\$ 74,887.14	\$ 98,643.86	\$ 173,531.00	\$ -
27 KI-SOUTHWIRE CO.	6,615	3,629,740	\$ 70,879.73	\$ 138,111.61	\$ 208,991.34	\$ -
28 KI-TYSON FOODS	10,705	5,968,810	\$ 114,704.08	\$ 227,113.22	\$ 341,817.30	\$ -
29 KI-VALLEY GRAIN	2,070	1,126,060	\$ 22,180.05	\$ 42,846.58	\$ 65,026.63	\$ 3,085.92
30						
31 SUBTOTAL INDUSTRIALS	170,713	77,900,258	\$ 1,557,307.43	\$ 3,230,528.70	\$ 4,787,836.13	\$ 5,207.51
32						
33 JPI-SHELL OIL	1,944	586,350	\$ 20,829.96	\$ 22,310.62	\$ 43,140.58	\$ -
34						
35 TOTAL INDUSTRIALS	172,657	78,486,608	\$ 1,578,137.39	\$ 3,252,839.32	\$ 4,830,976.71	\$ 5,207.51
36						
37						
38 GRAND TOTAL	514,063	224,462,434	\$ 6,291,247.22	\$ 9,821,751.49	\$ 16,112,998.71	\$ 5,207.51

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Big Rivers Electric Corporation
Monthly Billing Summary
Electric Utility Sales
April 2014

	BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FUEL ADJUSTMENT CLAUSE \$	FAC MILLS/ KWH
1 APRIL 2014						
2						
3 JP RURALS	\$ -	\$ 3,150,382.30	\$ 5.00	\$ 3,150,387.30	\$ 147,232.54	3.52
4 KENERGY RURALS	\$ -	\$ 5,772,784.25	\$ -	\$ 5,772,784.25	\$ 264,365.39	3.52
5 MEADE CO. RURALS	\$ -	\$ 2,358,855.45	\$ -	\$ 2,358,855.45	\$ 101,945.03	3.52
6						
7 TOTAL RURALS	\$ -	\$ 11,282,022.00	\$ 5.00	\$ 11,282,027.00	\$ 513,542.96	3.52
8						
9 KI-ACCURIDE	\$ -	\$ 136,792.83		\$ 136,792.83	\$ 7,487.04	3.52
10 KI-ALCOA	\$ -	\$ 3,422.23		\$ 3,422.23	\$ 161.86	3.52
11 KI-ALERIS	\$ -	\$ 880,339.30		\$ 880,339.30	\$ 54,320.49	3.52
12 KI-AMG ALUMINUM NORTH AMERICA	\$ -	\$ 44,284.80		\$ 44,284.80	\$ 2,112.10	3.52
13 KI-ARMSTRONG - DOCK	\$ 8,591.29	\$ 277,163.13		\$ 277,163.13	\$ 15,276.32	3.52
14 KI-ARMSTRONG - EQUALITY	\$ 3,589.83	\$ 90,370.03		\$ 90,370.03	\$ 4,984.06	3.52
15 KI-ARMSTRONG - LEWIS	\$ 2,166.63	\$ 83,825.68		\$ 83,825.68	\$ 4,356.02	3.52
16 KI-ARMSTRONG - MIDWAY	\$ -	\$ 149,093.45		\$ 149,093.45	\$ 8,862.09	3.52
17 KI-DOMTAR PAPER CO.	\$ -	\$ 569,633.05		\$ 569,633.05	\$ 37,806.53	3.52
18 KI-DOTIKI #3	\$ -	\$ 1,698.27		\$ 1,698.27	\$ 87.67	3.52
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ -	\$ 27,914.37		\$ 27,914.37	\$ 1,800.23	3.52
20 KI-HOPKINS CO. COAL	\$ -	\$ 2,296.08		\$ 2,296.08	\$ 111.24	3.52
21 KI-KIMBERLY-CLARK	\$ -	\$ 1,315,579.34		\$ 1,315,579.34	\$ 83,973.22	3.52
22 KI-PATRIOT COAL, LP	\$ -	\$ 266,423.87		\$ 266,423.87	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ -	\$ 71,736.39		\$ 71,736.39	\$ 688.47	3.52
24 KI-PRECOAT	\$ -	\$ 91,075.52		\$ 91,075.52	\$ 5,012.66	3.52
25 KI-SEBREE MINING-KMMC	\$ -	\$ 3,290.86		\$ 3,290.86	\$ 163.59	3.52
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ -	\$ 173,531.00		\$ 173,531.00	\$ 9,120.34	3.52
27 KI-SOUTHWIRE CO.	\$ -	\$ 208,991.34		\$ 208,991.34	\$ 12,769.43	3.52
28 KI-TYSON FOODS	\$ -	\$ 341,817.30		\$ 341,817.30	\$ 20,998.27	3.52
29 KI-VALLEY GRAIN	\$ -	\$ 68,112.55		\$ 68,112.55	\$ 3,961.48	3.52
30						
31 SUBTOTAL INDUSTRIALS	\$ 14,347.75	\$ 4,807,391.39	\$ -	\$ 4,807,391.39	\$ 274,053.11	3.52
32						
33 JPI-SHELL OIL	\$ -	\$ 43,140.58		\$ 43,140.58	\$ 2,062.78	3.52
34						
35 TOTAL INDUSTRIALS	\$ 14,347.75	\$ 4,850,531.97	\$ -	\$ 4,850,531.97	\$ 276,115.89	3.52
36						
37						
38 GRAND TOTAL	\$ 14,347.75	\$ 16,132,553.97	\$ 5.00	\$ 16,132,558.97	\$ 789,658.85	3.52

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Electric Utility Sales
April 2014

	ES \$	ES MILLS/ KWH	UNWIND SURCREDIT (US) \$	US MILLS/ KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
1 APRIL 2014							
2							
3 JP RURALS	\$ 150,660.98	3.60	\$ (5,315.10)	(0.13)	\$ (16,280.12)	\$ -	(0.39)
4 KENERGY RURALS	\$ 276,403.67	3.68	\$ (9,543.61)	(0.13)	\$ (29,231.99)	\$ -	(0.39)
5 MEADE CO. RURALS	\$ 113,314.45	3.91	\$ (3,680.22)	(0.13)	\$ (11,272.49)	\$ -	(0.39)
6							
7 TOTAL RURALS	\$ 540,379.10	3.70	\$ (18,538.93)	(0.13)	\$ (56,784.60)	\$ -	(0.39)
8							
9 KI-ACCURIDE	\$ 6,843.29	3.22	\$ (270.28)	(0.13)	\$ (827.87)	\$ -	(0.39)
10 KI-ALCOA	\$ 130.76	2.84	\$ (5.84)	(0.13)	\$ (17.90)	\$ -	(0.39)
11 KI-ALERIS	\$ 43,575.37	2.82	\$ (1,960.97)	(0.13)	\$ (6,006.44)	\$ -	(0.39)
12 KI-AMG ALUMINUM NORTH AMERICA	\$ 2,239.04	3.73	\$ (76.25)	(0.13)	\$ (233.54)	\$ -	(0.39)
13 KI-ARMSTRONG - DOCK	\$ 13,392.05	3.08	\$ (551.48)	(0.13)	\$ (1,689.17)	\$ -	(0.39)
14 KI-ARMSTRONG - EQUALITY	\$ 4,323.57	3.05	\$ (179.92)	(0.13)	\$ (551.11)	\$ -	(0.39)
15 KI-ARMSTRONG - LEWIS	\$ 4,072.83	3.29	\$ (157.25)	(0.13)	\$ (481.66)	\$ -	(0.39)
16 KI-ARMSTRONG - MIDWAY	\$ 7,373.54	2.93	\$ (319.92)	(0.13)	\$ (979.92)	\$ -	(0.39)
17 KI-DOMTAR PAPER CO.	\$ 27,994.50	2.60	\$ (1,364.82)	(0.13)	\$ (4,180.43)	\$ -	(0.39)
18 KI-DOTIKI #3	\$ 81.30	3.26	\$ (3.16)	(0.13)	\$ (9.69)	\$ -	(0.39)
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	\$ 1,360.73	2.66	\$ (64.99)	(0.13)	\$ (199.06)	\$ -	(0.39)
20 KI-HOPKINS CO. COAL	\$ 115.38	3.65	\$ (4.02)	(0.13)	\$ (12.30)	\$ -	(0.39)
21 KI-KIMBERLY-CLARK	\$ 64,907.12	2.72	\$ (3,031.44)	(0.13)	\$ (9,285.27)	\$ -	(0.39)
22 KI-PATRIOT COAL, LP	\$ -	0.00	\$ -	0.00	\$ -	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	\$ 3,834.09	19.59	\$ (24.85)	(0.13)	\$ (76.13)	\$ -	(0.39)
24 KI-PRECOAT	\$ 4,554.09	3.20	\$ (180.96)	(0.13)	\$ (554.27)	\$ -	(0.39)
25 KI-SEBREE MINING-KMMC	\$ 165.88	3.57	\$ (5.91)	(0.13)	\$ (18.09)	\$ -	(0.39)
26 KI-SEBREE MINING-STEAMPORT-ALLIED	\$ 8,709.78	3.36	\$ (329.24)	(0.13)	\$ (1,008.47)	\$ -	(0.39)
27 KI-SOUTHWIRE CO.	\$ 10,354.30	2.85	\$ (460.98)	(0.13)	\$ (1,411.97)	\$ -	(0.39)
28 KI-TYSON FOODS	\$ 16,926.47	2.84	\$ (758.04)	(0.13)	\$ (2,321.87)	\$ -	(0.39)
29 KI-VALLEY GRAIN	\$ 3,222.57	2.86	\$ (143.01)	(0.13)	\$ (438.04)	\$ -	(0.39)
30							
31 SUBTOTAL INDUSTRIALS	\$ 224,176.66	2.88	\$ (9,893.33)	(0.13)	\$ (30,303.20)	\$ -	(0.39)
32							
33 JPI-SHELL OIL	\$ 2,180.79	3.72	\$ (74.47)	(0.13)	\$ (228.09)	\$ -	(0.39)
34							
35 TOTAL INDUSTRIALS	\$ 226,357.45	2.88	\$ (9,967.80)	(0.13)	\$ (30,531.29)	\$ -	(0.39)
36							
37							
38 GRAND TOTAL	\$ 766,736.55	3.42	\$ (28,506.73)	(0.13)	\$ (87,315.89)	\$ -	(0.39)

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Big Rivers Electric Corporation
Monthly Billing Summary
Electric Utility Sales
April 2014

	CN 2013-00199 - REFUND FEB 2014 and MAR 2014	BILLING REFUND/K WH	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH
1 APRIL 2014						
2						
3 JP RURALS	(1,737,664.41)	(41.52)	\$ 1,689,021.19	40.36	\$ (427,004.49)	(10.20)
4 KENERGY RURALS	(3,306,968.86)	(44.01)	\$ 2,967,808.85	39.49	\$ (772,596.02)	(10.28)
5 MEADE CO. RURALS	(1,554,162.91)	(53.63)	\$ 1,004,999.31	34.68	\$ (304,656.98)	(10.51)
6						
7 TOTAL RURALS	(6,598,796.18)	(45.20)	\$ 5,661,829.35	38.79	\$ (1,504,257.49)	(10.30)
8						
9 KI-ACCURIDE	(59,941.30)	(28.17)	\$ 90,083.71	42.33	\$ (20,895.86)	(9.82)
10 KI-ALCOA	(1,864.45)	(40.52)	\$ 1,826.66	39.70	\$ (434.56)	(9.44)
11 KI-ALERIS	(313,238.09)	(20.29)	\$ 657,029.66	42.55	\$ (145,530.51)	(9.43)
12 KI-AMG ALUMINUM NORTH AMERICA	(25,321.57)	(42.18)	\$ 23,004.58	38.32	\$ (6,203.28)	(10.33)
13 KI-ARMSTRONG - DOCK	(124,080.99)	(28.57)	\$ 179,509.86	41.34	\$ (42,064.45)	(9.69)
14 KI-ARMSTRONG - EQUALITY	(36,002.66)	(25.41)	\$ 62,943.97	44.43	\$ (13,678.25)	(9.65)
15 KI-ARMSTRONG - LEWIS	(43,520.25)	(35.15)	\$ 48,095.37	38.84	\$ (12,248.73)	(9.89)
16 KI-ARMSTRONG - MIDWAY	(54,951.01)	(21.81)	\$ 109,078.23	43.30	\$ (24,006.96)	(9.53)
17 KI-DOMTAR PAPER CO.	(154,574.81)	(14.38)	\$ 475,314.02	44.23	\$ (98,954.28)	(9.21)
18 KI-DOTIKI #3	(874.63)	(35.10)	\$ 979.76	39.32	\$ (245.85)	(9.87)
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	(7,961.56)	(15.56)	\$ 22,849.72	44.65	\$ (4,739.61)	(9.26)
20 KI-HOPKINS CO. COAL	(1,421.30)	(44.95)	\$ 1,085.08	34.32	\$ (324.16)	(10.25)
21 KI-KIMBERLY-CLARK	(395,899.71)	(16.59)	\$ 1,056,243.26	44.25	\$ (222,518.02)	(9.32)
22 KI-PATRIOT COAL, LP		-	\$ 266,423.87	-	\$ -	0.00
23 KI-PENNYRILE ENERGY, LLC	(42,523.54)	(217.29)	\$ 33,634.43	171.87	\$ (5,126.30)	(26.19)
24 KI-PRECOAT	(43,109.18)	(30.26)	\$ 56,797.86	39.86	\$ (13,962.44)	(9.80)
25 KI-SEBREE MINING-KMMC	(1,814.47)	(39.02)	\$ 1,781.86	38.32	\$ (472.92)	(10.17)
26 KI-SEBREE MINING-STEAMPORT-ALLIED	(86,741.80)	(33.46)	\$ 103,281.61	39.84	\$ (25,827.93)	(9.96)
27 KI-SOUTHWIRE CO.	(76,737.76)	(21.14)	\$ 153,504.36	42.29	\$ (34,321.47)	(9.46)
28 KI-TYSON FOODS	(115,060.90)	(19.28)	\$ 261,601.23	43.83	\$ (56,338.52)	(9.44)
29 KI-VALLEY GRAIN	(29,004.09)	(25.76)	\$ 45,711.46	40.59	\$ (10,657.94)	(9.46)
30						
31 SUBTOTAL INDUSTRIALS	(1,614,644.07)	(20.73)	\$ 3,650,780.56	46.86	\$ (738,552.04)	(9.48)
32						
33 JPI-SHELL OIL	(25,436.13)	(43.38)	\$ 21,645.46	36.92	\$ (6,052.46)	(10.32)
34						
35 TOTAL INDUSTRIALS	(1,640,080.20)	(20.90)	\$ 3,672,426.02	46.79	\$ (744,604.50)	(9.49)
36						
37						
38 GRAND TOTAL	(8,238,876.38)	(36.70)	\$ 9,334,255.37	41.58	\$ (2,248,861.99)	(10.02)

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Monthly Billing Summary
Electric Utility Sales
April 2014

	CN 2013-00199 MRSM TO OFF- SET BASE RATE INCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	REVENUE \$ NET OF MRSM \$ BASE RATE CREDIT \$ REFUND \$ - CN 2013-00199 \$	REV NET OF MRSM, BASE RATE CREDIT, REFUND MILLS/ KWH
1 APRIL 2014				
2				
3 JP RURALS	(500,286.58)	(11.95)	\$ 2,499,394.53	59.72
4 KENERGY RURALS	(905,796.91)	(12.05)	\$ 4,596,384.78	61.17
5 MEADE CO. RURALS	(357,862.51)	(12.35)	\$ 1,896,642.73	65.45
6				
7 TOTAL RURALS	(1,763,946.00)	(12.08)	\$ 8,992,422.04	61.60
8				
9 KI-ACCURIDE	(17,132.09)	(8.05)	\$ 111,997.06	52.63
10 KI-ALCOA	(370.38)	(8.05)	\$ 2,886.17	62.73
11 KI-ALERIS	(124,297.88)	(8.05)	\$ 700,439.36	45.36
12 KI-AMG ALUMINUM NORTH AMERICA	(4,832.98)	(8.05)	\$ 37,289.89	62.11
13 KI-ARMSTRONG - DOCK	(34,955.76)	(8.05)	\$ 226,570.64	52.18
14 KI-ARMSTRONG - EQUALITY	(11,404.68)	(8.05)	\$ 73,863.70	52.14
15 KI-ARMSTRONG - LEWIS	(9,967.59)	(8.05)	\$ 69,399.30	56.05
16 KI-ARMSTRONG - MIDWAY	(20,278.51)	(8.05)	\$ 119,743.77	47.53
17 KI-DOMTAR PAPER CO.	(86,510.11)	(8.05)	\$ 444,424.44	41.35
18 KI-DOTIKI #3	(200.61)	(8.05)	\$ 1,407.93	56.50
19 KI-ELK CREEK MINE - HOPKINS CO. COAL	(4,119.35)	(8.05)	\$ 21,952.32	42.90
20 KI-HOPKINS CO. COAL	(254.54)	(8.05)	\$ 1,927.68	60.96
21 KI-KIMBERLY-CLARK	(192,150.20)	(8.05)	\$ 1,037,474.75	43.46
22 KI-PATRIOT COAL, LP	0.00	0.00	\$ 266,423.87	0.00
23 KI-PENNYRILE ENERGY, LLC	(1,575.39)	(8.05)	\$ 69,456.28	354.91
24 KI-PRECOAT	(11,470.12)	(8.05)	\$ 74,474.48	52.27
25 KI-SEBREE MINING-KMMC	(374.33)	(8.05)	\$ 2,749.08	59.12
26 KI-SEBREE MINING-STEAMPORT-ALLIED	(20,869.46)	(8.05)	\$ 143,326.02	55.29
27 KI-SOUTHWIRE CO.	(29,219.41)	(8.05)	\$ 166,701.24	45.93
28 KI-TYSON FOODS	(48,048.92)	(8.05)	\$ 272,274.69	45.62
29 KI-VALLEY GRAIN	(9,064.78)	(8.05)	\$ 54,992.83	48.84
30				
31 SUBTOTAL INDUSTRIALS	(627,097.09)	(8.05)	\$ 3,899,775.50	50.06
32				
33 JPI-SHELL OIL	(4,720.12)	(8.05)	\$ 36,309.01	61.92
34				
35 TOTAL INDUSTRIALS	\$ (631,817.21)	(8.05)	\$ 3,936,084.51	50.15
36				
37				
38 GRAND TOTAL	\$ (2,395,763.21)	(10.67)	\$ 12,928,506.55	57.60

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**Big Rivers Electric Corporation
Monthly Billing Summary
Smelters
November 2013**

1 NOVEMBER 2013

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
2						
3	BASE MONTHLY ENERGY -					
4	0	-	0	-	-	0.00
5	265,062,080	-	8,193,256	-	273,255,336	56.31
6	265,062,080	-	8,193,256	-	273,255,336	
7						
8	BASE FIXED ENERGY					
9	0					
10	260,021,440					
11	260,021,440					
12						
13	BASE VARIABLE ENERGY					
14	0					
15	5,040,640					
16	5,040,640					
17						
18						
19		TIER ADJ	CREDIT SURPLUS	BACKUP ENERGY	SUPPLEMENTAL	ADJ
20		\$ -	\$ -	\$ -	\$ -	\$ -
21		\$ 776,638.24	\$ -	\$ 747,010.21	\$ -	\$ -
22		\$ 776,638.24	\$ -	\$ 747,010.21	\$ -	\$ -
23						
24	CENTURY ALUMINUM (Special Contract)					
25	ALCAN RIO TINTO (Special Contract)					
26	TOTAL CENTURY / ALCAN RIO TINTO					
27						
28	BALANCE AS SHOWN ON OPERATING REPORT					

**Big Rivers Electric Corporation
Monthly Billing Summary
Smelters
November 2013**

1 NOVEMBER 2013

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC,ES, NONFAC PPA, SURCHARGE
	AMT	MILLS	AMT	MILLS	AMT	MILLS		
2								
3 BASE MONTHLY ENERGY -								
4 CENTURY ALUMINUM (<i>Special Contract</i>)	\$ -	0.00	\$ -	0.00	\$ -	0.00	\$ -	\$ -
5 ALCAN RIO TINTO (<i>Special Contract</i>)	\$ 713,547.12	2.69	\$ 799,309.69	3.02	\$ (7,156.68)	(0.03)	\$ 488,810.73	\$ 1,994,510.86
6	\$ 713,547.12		\$ 799,309.69		\$ (7,156.68)		\$ 488,810.73	\$ 1,994,510.86
7								
8 BASE FIXED ENERGY								
9 CENTURY ALUMINUM (<i>Special Contract</i>)								\$ -
10 ALCAN RIO TINTO (<i>Special Contract</i>)								\$ 11,760,249.69
11								
12								
13 BASE VARIABLE ENERGY								
14 CENTURY ALUMINUM (<i>Special Contract</i>)								\$ -
15 ALCAN RIO TINTO (<i>Special Contract</i>)								\$ 109,916.20
16								
17								
18								
19								
20 CENTURY ALUMINUM (<i>Special Contract</i>)								\$ -
21 ALCAN RIO TINTO (<i>Special Contract</i>)								\$ 1,523,648.45
22								
23								
24 CENTURY ALUMINUM (<i>Special Contract</i>)								\$ -
25 ALCAN RIO TINTO (<i>Special Contract</i>)								\$ 15,388,325.20
26 TOTAL CENTURY / ALCAN RIO TINTO								\$ 15,388,325.20
27								
28 BALANCE AS SHOWN ON OPERATING REPORT								\$ 15,388,325.20

**Big Rivers Electric Corporation
Monthly Billing Summary
Smelters
December 2013**

1 DECEMBER 2013		PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
	kWh					
2						
3	BASE MONTHLY ENERGY -					
4	CENTURY ALUMINUM (<i>Special Contract</i>)	0	0	-	-	0.00
5	ALCAN RIO TINTO (<i>Special Contract</i>)	273,136,707	4,300,818	-	284,565,525	54.64
6		273,136,707	4,300,818	-	284,565,525	
7						
8	BASE FIXED ENERGY					
9	CENTURY ALUMINUM (<i>Special Contract</i>)	0				
10	ALCAN RIO TINTO (<i>Special Contract</i>)	268,316,160				
11		268,316,160				
12						
13	BASE VARIABLE ENERGY					
14	CENTURY ALUMINUM (<i>Special Contract</i>)	0				
15	ALCAN RIO TINTO (<i>Special Contract</i>)	4,820,547				
16		4,820,547				
17						
18						
19						
20	CENTURY ALUMINUM (<i>Special Contract</i>)					
21	ALCAN RIO TINTO (<i>Special Contract</i>)	\$ 776,638.24	\$ 290,120.36	\$ 282,117.91	\$ -	\$ -
22		\$ 776,638.24	\$ 290,120.36	\$ 282,117.91	\$ -	\$ -
23						
24	CENTURY ALUMINUM (<i>Special Contract</i>)					
25	ALCAN RIO TINTO (<i>Special Contract</i>)					
26	TOTAL CENTURY / ALCAN RIO TINTO					
27						
28	ADJ FOR CN 2011-00036:					
29	CENTURY					
30	ALCAN					
31						
32	ADJ FOR TIER - 2013					
33	CENTURY-HAWESVILLE					
34	ALCAN (01/2013 thru 05/2013)					
35	CENTURY-SEBREE (06/2013 thru 12/2013)					
36						
37	BALANCE AS SHOWN ON OPERATING REPORT					

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**Big Rivers Electric Corporation
Monthly Billing Summary
Smelters
December 2013**

1 DECEMBER 2013	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC,ES, NONFAC PPA, SURCHARGE
	AMT	MILLS	AMT	MILLS	AMT	MILLS		
2								
3	BASE MONTHLY ENERGY -							
4	\$ -	0.00	\$ -	0.00	\$ -	0.00	\$ -	\$ -
5	\$ 709,609.17	2.60	\$ 780,002.05	2.86	\$ (29,225.63)	(0.11)	\$ 498,764.39	\$ 1,959,149.98
6	\$ 709,609.17		\$ 780,002.05		\$ (29,225.63)		\$ 498,764.39	\$ 1,959,149.98
7	BASE FIXED ENERGY							
8	CENTURY ALUMINUM (Special Contract)							
9								\$ -
10								\$ 12,135,403.28
11	BASE VARIABLE ENERGY							
12	CENTURY ALUMINUM (Special Contract)							
13								\$ -
14								\$ 105,116.85
15	CENTURY ALUMINUM (Special Contract)							
16								\$ -
17								\$ 1,348,876.51
18	CENTURY ALUMINUM (Special Contract)							
19								\$ -
20								\$ 15,548,546.62
21	CENTURY ALUMINUM (Special Contract)							
22								\$ 15,548,546.62
23	CENTURY ALUMINUM (Special Contract)							
24								\$ -
25								\$ 15,548,546.62
26	TOTAL CENTURY / ALCAN RIO TINTO							
27								\$ -
28	ADJ FOR CN 2011-00036:							
29							0.00	\$ -
30							0.00	\$ 15,548,546.62
31	ADJ FOR TIER - 2013							
32								\$ -
33							(2,485,699.89)	(2,485,699.89)
34							(1,244,065.12)	(1,244,065.12)
35							(1,741,691.16)	13,806,855.46
36	BALANCE AS SHOWN ON							
37								\$ 10,077,090.45
	OPERATING REPORT							

**Big Rivers Electric Corporation
Monthly Billing Summary
Smelters
January 2014**

1 JANUARY 2014

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
2						
3	BASE MONTHLY ENERGY -					
4	0	-	0	-	-	0.00
5	272,789,616	7,460,000	4,650,410	-	284,900,026	56.10
6	<u>272,789,616</u>	<u>7,460,000</u>	<u>4,650,410</u>	<u>-</u>	<u>284,900,026</u>	
7						
8	BASE FIXED ENERGY					
9	0					
10	268,316,160					
11	<u>268,316,160</u>					
12						
13	BASE VARIABLE ENERGY					
14	0					
15	4,473,456					
16	<u>4,473,456</u>					

	TIER ADJ	CREDIT SURPLUS	BACKUP ENERGY	SUPPLEMENTAL	ADJ
17					
18					
19					
20	\$ -	\$ -	\$ -	\$ -	\$ -
21	\$ 791,532.67	\$ -	\$ 431,232.98	\$ 318,791.52	\$ 1,882.94
22	<u>\$ 791,532.67</u>	<u>\$ -</u>	<u>\$ 431,232.98</u>	<u>\$ 318,791.52</u>	<u>\$ 1,882.94</u>
23					
24	CENTURY ALUMINUM (Special Contract)				
25	ALCAN RIO TINTO (Special Contract)				
26	TOTAL CENTURY / ALCAN RIO TINTO				
27					
28	BALANCE AS SHOWN ON OPERATING REPORT				

**Big Rivers Electric Corporation
Monthly Billing Summary
Smelters
January 2014**

1 JANUARY 2014

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC,ES, NONFAC PPA, SURCHARGE
	AMT	MILLS	AMT	MILLS	AMT	MILLS		
2								
3	BASE MONTHLY ENERGY -							
4	CENTURY ALUMINUM (<i>Special Contract</i>)							
5	\$	-	0.00	\$	-	0.00	\$	-
5	\$	574,767.72	2.11	\$	859,839.99	3.15	\$	2,206,161.72
6	\$	574,767.72		\$	859,839.99		\$	2,206,161.72
7								
8	BASE FIXED ENERGY							
9	CENTURY ALUMINUM (<i>Special Contract</i>)							
10							\$	-
10							\$	12,135,403.28
11								
12								
13	BASE VARIABLE ENERGY							
14	CENTURY ALUMINUM (<i>Special Contract</i>)							
15							\$	-
15							\$	97,548.18
16								
17								
18								
19								
20	CENTURY ALUMINUM (<i>Special Contract</i>)							
21							\$	-
21							\$	1,543,440.11
22								
23								
24	CENTURY ALUMINUM (<i>Special Contract</i>)							
25							\$	-
25							\$	15,982,553.29
26	TOTAL CENTURY / ALCAN RIO TINTO							
27							\$	15,982,553.29
28	BALANCE AS SHOWN ON OPERATING REPORT							
							\$	15,982,553.29

**Big Rivers Electric Corporation
Monthly Billing Summary
Others
November 2013**

1 <u>NOVEMBER 2013</u>	<u>KWH</u>	<u>AMOUNT</u>	<u>REVENUE \$ MILLS/KWH</u>
2			
3 SPECIAL SALES TO RUS BORROWERS:			
4			
5			
6 KENERGY-DOMTAR COGEN	2,233,457	\$ 87,642.11	39.24
7 POWERSOUTH ENERGY COOP			
8			
9 TOTAL SPECIAL SALES TO RUS BORROWERS	2,233,457	\$ 87,642.11	39.24
10			
11			
12			
13 TO OTHER THAN RUS BORROWERS:			
14			
15 CARGILL POWER MARKETS	36,000,000	\$ 1,269,000.00	35.25
16 HMPL			
17 MISO	135,781,112	\$ 3,869,476.61	28.50
18 PJM		\$ 4,915.16	
19			
20 TOTAL TO OTHER THAN RUS BORROWERS	171,781,112	\$ 5,143,391.77	29.94
21			
22			
23 TOTAL SALES FOR RESALE NOVEMBER 2013	<u>174,014,569</u>	<u>\$ 5,231,033.88</u>	<u>30.06</u>

**Big Rivers Electric Corporation
Monthly Billing Summary
Others
December 2013**

1 DECEMBER 2013	KWH	AMOUNT	REVENUE \$ MILLS/KWH
2			
3 SPECIAL SALES TO RUS BORROWERS:			
4			
5			
6 KENERGY-DOMTAR COGEN	2,283,746	\$ 97,340.44	42.62
7 POWERSOUTH ENERGY COOP			
8			
9 TOTAL SPECIAL SALES TO RUS BORROWERS	2,283,746	\$ 97,340.44	42.62
10			
11			
12			
13 TO OTHER THAN RUS BORROWERS:			
14			
15 CARGILL POWER MARKETS	37,200,000	\$ 1,311,300.00	35.25
16 HMPL			
17 MISO	242,347,599	\$ 7,447,614.59	30.73
18 PJM		\$ -	
19			
20 TOTAL TO OTHER THAN RUS BORROWERS	279,547,599	\$ 8,758,914.59	31.33
21			
22			
23 TOTAL SALES FOR RESALE DECEMBER 2013	281,831,345	\$ 8,856,255.03	31.42

**Big Rivers Electric Corporation
Monthly Billing Summary
Others
January 2014**

1 JANUARY 2014	KWH	AMOUNT	REVENUE \$ MILLS/KWH
2			
3 SPECIAL SALES TO RUS BORROWERS:			
4			
5			
6 KENERGY-DOMTAR COGEN	2,329,048	\$ 387,757.90	166.49
7 POWERSOUTH ENERGY COOP			
8			
9 TOTAL SPECIAL SALES TO RUS BORROWERS	2,329,048	\$ 387,757.90	166.49
10			
11			
12			
13 TO OTHER THAN RUS BORROWERS:			
14			
15 CARGILL POWER MARKETS	41,200,000	\$ 1,700,000.00	41.26
16 HMPL			
17 MISO	189,234,943	\$ 9,041,491.83	47.78
18 PJM		\$ 1,737.49	
19			
20 TOTAL TO OTHER THAN RUS BORROWERS	230,434,943	\$ 10,743,229.32	46.62
21			
22			
23 TOTAL SALES FOR RESALE JANUARY 2014	<u>232,763,991</u>	<u>\$ 11,130,987.22</u>	<u>47.82</u>

**Big Rivers Electric Corporation
Monthly Billing Summary
Others
February 2014**

1 FEBRUARY 2014	KWH	AMOUNT	REVENUE \$ MILLS/KWH
2			
3 SPECIAL SALES TO RUS BORROWERS:			
4			
5			
6 KENERGY-DOMTAR COGEN	2,066,042	\$ 186,645.85	90.34
7 POWERSOUTH ENERGY COOP			
8			
9 TOTAL SPECIAL SALES TO RUS BORROWERS	2,066,042	\$ 186,645.85	90.34
10			
11			
12			
13 TO OTHER THAN RUS BORROWERS:			
14			
15 CARGILL POWER MARKETS	0	\$ 43,200.00	0.00
16 EDF TRADING	134,600,000	\$ 5,518,600.00	41.00
17 MISO	361,908,754	\$ 17,522,917.97	48.42
18 PJM		\$ 7,736.99	
19			
20 TOTAL TO OTHER THAN RUS BORROWERS	496,508,754	\$ 23,092,454.96	46.51
21			
22			
23 TOTAL SALES FOR RESALE FEBRUARY 2014	498,574,796	\$ 23,279,100.81	46.69

**Big Rivers Electric Corporation
Monthly Billing Summary
Others
March 2014**

1 MARCH 2014	KWH	AMOUNT	REVENUE \$ MILLS/KWH
2			
3 SPECIAL SALES TO RUS BORROWERS:			
4			
5			
6 KENERGY-DOMTAR COGEN	2,283,750	\$ 114,072.05	49.95
7 POWERSOUTH ENERGY COOP			
8			
9 TOTAL SPECIAL SALES TO RUS BORROWERS	2,283,750	\$ 114,072.05	49.95
10			
11			
12			
13 TO OTHER THAN RUS BORROWERS:			
14			
15 CARGILL POWER MARKETS	0	\$ -	0.00
16 EDF TRADING	148,600,000	\$ 6,092,600.00	41.00
17 MISO	451,562,486	\$ 18,737,924.86	41.50
18 PJM		\$ 146.39	
19			
20 TOTAL TO OTHER THAN RUS BORROWERS	600,162,486	\$ 24,830,671.25	41.37
21			
22			
23 TOTAL SALES FOR RESALE MARCH 2014	602,446,236	\$ 24,944,743.30	41.41

**Big Rivers Electric Corporation
Monthly Billing Summary
Others
April 2014**

1 APRIL 2014	KWH	AMOUNT	REVENUE \$ MILLS/KWH
2			
3 SPECIAL SALES TO RUS BORROWERS:			
4			
5			
6 KENERGY-DOMTAR COGEN	5,094,648	\$ 254,525.58	49.96
7 POWERSOUTH ENERGY COOP			
8			
9 TOTAL SPECIAL SALES TO RUS BORROWERS	5,094,648	\$ 254,525.58	49.96
10			
11			
12			
13 TO OTHER THAN RUS BORROWERS:			
14			
15 CARGILL POWER MARKETS	0	\$ -	0.00
16 EDF TRADING	70,400,000	\$ 3,043,483.93	43.23
17 HMPL	213,000	\$ 6,055.04	28.43
18 HEREC		\$ 540,000.00	
19 MISO	515,463,982	\$ 18,470,995.02	35.83
20 PJM		\$ 7.26	
21			
22 TOTAL TO OTHER THAN RUS BORROWERS	586,076,982	\$ 22,060,541.25	37.64
23			
24			
25 TOTAL SALES FOR RESALE APRIL 2014	591,171,630	\$ 22,315,066.83	37.75

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 7)** *List Big Rivers' scheduled, actual, and forced outages from*
2 *November 1, 2013, through April 30, 2014.*

3

4 **Response)** Please see the attached summary for the requested information
5 regarding scheduled ("S"), actual ("A"), and forced ("F") outages. This summary
6 includes Coleman outages after August 20, 2013; however, those outages are not
7 factored into Big Rivers' FAC.

8

9

10 **Witness)** Lawrence V. Baronowsky

11

Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014

Big Rivers Electric Corporation
 Reid Station Unit #1 - Coal - 65MW Net
 November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November	No Outages								
December	No Outages								
January	F			1/2/2014 2:04	1/2/2014 5:28		3:24		The unit tripped on low condenser vacuum due to a faulty vacuum switch.
February	F			2/6/2014 21:58	2/7/2014 3:26		5:28		The unit tripped on a master fuel trip due to a loose electrical connection on G3 gas burner.
	F			2/14/2014 8:12	2/16/2014 2:37		42:25		The unit was removed from service due to a tube leak in the high temperature superheater section of the boiler.
	F			2/16/2014 2:46	2/16/2014 6:03		3:17		The unit tripped on low vacuum shortly after start up.
March	F			3/12/2014 0:56	3/12/2014 6:01		5:05		The unit tripped on low condenser vacuum due to #1 Circulating Water Pump trip.
	F			3/22/2014 22:54	3/23/2014 2:54		4:00		The unit tripped on low condenser vacuum when the control operator was back-washing the condenser.
April	No Outages								

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

Page 1 of 11

**Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014**

Big Rivers Electric Corporation

Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net

November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November	S,A	11/4/2013 7:00	11/4/2013 17:00	11/4/2013 7:00	11/4/2013 16:40	10:00		9:40	Unit was removed from reserve standby to inspect the cranking motor transformer. A starting failure was declared when the unit did not tie online in the allotted time due to a faulty contact in the generator breaker.
	F			11/4/2013 17:05	11/4/2013 18:37			1:32	
December	No Outages								
January	F			1/6/2014 5:57	1/6/2014 6:22			0:25	A starting failure was declared when the unit did not tie online in the allotted time due to loss of flame detection in the combustion chamber.
	S,A	1/14/2014 6:00	1/16/2014 6:00	1/14/2014 6:00	1/16/2014 0:19	48:00		42:19	Unit was removed from reserve standby for a boroscopic inspection of the turbine and compressor rotors. The inspection was completed 05:49 ahead of schedule.
February	F			2/11/2014 5:43	2/11/2014 6:41			0:58	A starting failure was declared when the unit did not tie online in the allotted time due to failure of the natural gas regulating valve.

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

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**Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014**

Big Rivers Electric Corporation

Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net

November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
March	F			3/3/2014 5:14	3/3/2014 5:49			0:35	A starting failure was declared when the unit did not tie online in the allotted time due to loss of flame detection in the combustion chamber.
	S,A	3/13/2014 8:00	3/13/2014 12:00	3/13/2014 8:00	3/13/2014 11:38	4:00		3:38	Unit was removed from reserve standby for ET&S Technicians to inspect 01181 disconnect switch to the scrubber feed transformer.
	S,A	3/25/2014 7:00	3/25/2014 13:00	3/25/2014 7:00	3/25/2014 13:00	6:00		6:00	Unit was removed from reserve standby for ET&S Technicians to repair 01181 disconnect switch to the scrubber feed transformer.
April	S,A	4/10/2014 6:00	4/10/2014 14:00	4/10/2014 6:00	4/10/2014 14:00	8:00		8:00	Unit was removed from reserve standby for maintenance to inspect the exhaust duct, silencer, and exhaust stack.

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

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Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014

Big Rivers Electric Corporation

Henderson Station Two - Unit #1 - Coal - 153MW Net

November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November		No Outages							
December		No Outages							
January		No Outages							
February	S,A	2/8/2014 16:00	2/10/2014 0:00	2/8/2014 15:46	2/9/2014 21:38	32:00		29:52	Unit was removed from service to repair an external water wall tube leak on the east side of the boiler.
March		No Outages							
April	S,A	4/10/2014 7:00	4/11/2014 7:00	4/10/2014 7:05	4/11/2014 7:09	24:00		24:04	Unit was removed from service to repair a condenser tube leak.
	S,A	4/26/2014 0:00	----->	4/26/2014 0:13	----->	120:00		119:47	The unit was removed from service for a 21 day planned maintenance outage. The unit was returned to service on May 17, 2014 @ 04:14, four hours and one minute behind schedule, due to minor issues with the new pulverizer wear liners installed during the outage.

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

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Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014

Big Rivers Electric Corporation
Henderson Station Two - Unit #2 - Coal - 159MW Net
 November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November		No Outages							
December	F			12/6/2013 11:51	12/6/2013 14:19		2:28		The unit tripped on low drum level due to a boiler upset caused by the control operator tripping "B" pulverizer to arrest a fire in the classifier.
January	F			1/31/2014 19:14	----->		4:46		The unit was removed from service to repair a radiant superheater tube leak.
February	F			----->	2/3/2014 6:03		54:03		
March		No Outages							
April	F			4/26/2014 0:37	4/26/2014 2:46		2:09		The unit tripped on low condenser vacuum due to operator error. The Operator was sent to open the vacuum breaker on Unit 1 that was coming off line for a planned maintenance outage, but instead opened the vacuum breaker on Unit 2.

Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014

Big Rivers Electric Corporation
Green Station Unit #1 - Coal/Pet coke - 231MW Net
November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November	S,A	11/2/2013 0:00	11/26/2013 0:00	11/2/2013 1:25	11/24/2013 10:26	576:00		537:01	Unit was removed from service for a 24 day planned maintenance outage. Maintenance work was completed 39 hours ahead of schedule.
	F			11/26/2013 23:55	11/27/2013 21:08		21:13		Unit was removed from service to repack the economizer inlet valve.
December	F			12/2/2013 7:26	12/3/2013 6:57		23:31		Unit tripped on high furnace pressure due to a tube leak in the front water wall.
January	F			1/6/2014 1:56	1/6/2014 6:49		4:53		Unit tripped on high drum level due to a frozen drum level transmitter.
	F			1/6/2014 9:18	1/6/2014 16:33		7:15		Unit was removed from service to repair "B" phase of the generator disconnect switch.
February	F			2/7/2014 6:59	2/7/2014 14:18		7:19		Unit tripped on low drum level due to "B" and "D" pulverizers tripping causing a boiler upset.
	F			2/25/2014 0:28	2/25/2014 1:18		0:50		Unit tripped on master fuel trip due to last mill in service tripped.
March	F			3/15/2014 15:48	3/16/2014 21:42		29:54		Unit was removed from service to repair a tube leak in the intermediate reheater section of the boiler.
				3/17/2014 4:20	3/18/2014 15:58		35:38		Unit was removed from service to repair a tube leak in the primary superheater section of the boiler.
April		No Outages							

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

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Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages November 1, 2012 thru April 30, 2013

Big Rivers Electric Corporation
Green Station Unit #2 - Coal/Pet coke - 223MW Net
November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November	S,A	11/30/2013 0:00	----->	11/30/2013 0:02	----->	24:00		23:58	Unit was removed from service for a 48 hour planned maintenance outage to wash the air heaters. The outage was extended due to discovery of a leak in the circulating water line.
December	S,A	----->	12/2/2013 0:00	----->	12/2/2013 7:02	24:00		31:02	
	F			12/7/2013 1:48	12/7/2013 19:12		17:24		The unit tripped off line due to a ruptured steam seal header on the mezzanine level beneath the turbine.
	F			12/7/2013 20:23	12/8/2013 3:50		7:27		Unit tripped on low control air pressure after the plant air compressors tripped on high oil temperature following a problem with the closed cooling water system.
	F			12/9/2013 0:24	12/10/2013 6:54		30:30		The unit was removed from service to repair a steam leak in the air heater soot blower supply header.
	F			12/10/2013 10:31	12/10/2013 13:02		2:31		Unit tripped on generator voltage due to a faulty control card in the voltage regulator.
January		No Outages							
February		No Outages							
March		No Outages							
April	S,A	4/5/2014 0:00	4/7/2014 0:00	4/5/2014 0:51	4/7/2014 3:09	48:00		50:18	Unit was removed from service for a 48 hour planned maintenance outage to wash the air heaters and to repair a tube leak. Start up was delayed due to issues with "B" ID Fan control relays.
	F			4/7/2014 3:10	4/7/2014 3:29		0:19		

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

Page 7 of 11

Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014

Big Rivers Electric Corporation
Coleman Station Unit #1 - Coal - 150MW Net
November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November		No Outages							
December	F			12/11/2013 0:00	12/13/2013 23:47		71:47		Unit was removed from service to repair tube leaks in the heat recovery section side wall.
January	F			1/20/2014 16:56	1/22/2014 13:45		44:49		Unit was removed from service to repair a tube leak in the reheater section of the boiler.
February	F			2/15/2014 18:21	2/19/2014 4:35		82:14		Unit was removed from service to repair a water wall tube leak.
March	F			3/14/2014 14:48	3/20/2014 23:22		152:34		Unit was removed from service to repair a tube leak in the reheater section of the boiler. On 3/17/2014 @ 18:00 the unit was placed in reserve standby status.
	F			3/21/2014 4:02	3/22/2014 23:31		43:29		Unit was removed from service to repair a leak in the west side secondary air duct. On 3/21/2014 @ 22:30 the unit was placed on reserve standby status.
April	S,A	4/18/2014 23:00	4/20/2014 0:00	4/18/2014 22:47	4/19/2014 23:39	25:00		24:52	Unit was removed from service and placed in reserve standby status.
	S,A	4/27/2014 17:53	----->	5/1/2014 0:00	----->	78:07		27:00	Unit was removed from service due to a tube leak in the reheat section of the boiler. Repairs were made and on 4/29/2014 @ 21:00 the unit was placed in reserve standby status. On 5/1/2014 @ 00:00 the unit was placed in inactive reserve status for unit idling.

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

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Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014

Big Rivers Electric Corporation
Coleman Station Unit #2 - Coal - 138MW Net
November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November		No Outages							
December	F			12/1/2013 14:11	12/4/2013 23:07		80:56		The unit was removed from service to repair a tube leak in the primary superheater section of the boiler.
January	F			1/5/2014 18:25	1/10/2014 9:20		110:55		The unit tripped on high furnace pressure due to a water wall tube leak.
February	S,A	2/16/2014 9:00	2/20/2014 0:00	2/16/2014 9:12	2/20/2014 23:01	87:00		109:49	Unit was removed from service to remove slag build up from the furnace and heat recovery area. On 2/20/2014 @ 01:00 the unit was placed in reserve standby status.
March	F			3/10/2014 9:42	3/11/2014 7:55		22:13		Unit tripped on ED-4 generator differential relay when moisture from a steam leak caused a short in the voltage regulator control cabinet.
April	F			4/9/2014 13:54	4/12/2014 22:13		80:19		Unit was removed from service to repair a water wall tube leak inside the boiler penthouse.
	S,A	4/30/2014 8:00	----->	4/30/2014 8:13	----->	16:00			Unit was removed from service and placed in reserve standby status. On 5/1/2014 @ 11:16 the unit was placed in inactive reserve status for unit idling.

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

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Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages November 1, 2013 thru April 30, 2014

Big Rivers Electric Corporation
Coleman Station Unit #3 - Coal - 155MW Net
November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November	F			11/18/2013 13:53	11/18/2013 20:00		6:07		Unit tripped on low vacuum due to a faulty vacuum switch.
	S,A	11/23/2013 0:00	11/26/2013 0:00	11/22/2013 23:56	11/25/2013 23:30	72:00		71:34	Unit was removed from service to inspect the bypass stack and repair gas leaks on the economizer outlet duct expansion joints.
December	F			12/1/2013 1:41	12/1/2013 3:16		1:35		Unit tripped during the weekly emergency governor exerciser test due to a faulty limit switch.
January	F			1/6/2014 5:00	1/9/2014 23:21		90:21		Unit was removed from service to repair a tube leak in the south water wall.
	F			1/12/2014 14:13	1/17/2014 14:24		120:11		Unit was removed from service to repair tube leaks in the secondary superheater section of the boiler.
February	F			2/15/2014 8:05	2/18/2014 10:04		73:59		Unit was removed from service to repair tube leaks in the secondary superheater section of the boiler.
March	F			3/10/2014 10:01	3/11/2014 0:49		14:48		Unit was removed from service to repair "A" boiler feed pump recirculation line.
	F			3/11/2014 20:34	3/11/2014 21:51		1:17		Unit tripped on low turbine lube oil pressure due to "B" turbine lube oil pump tripped when moisture from a steam leak near the motor control center cabinet tripped the "B" MCC main breaker.
April	F			4/23/2014 23:26	4/24/2014 22:36		23:10		Unit was removed from service to repair an external water wall tube leak. Unit was removed from service on 5/1/2014 @ 15:08 and placed in reserve standby status. On 5/8/2014 @ 17:54 the unit was placed in inactive reserve status for unit idling.

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

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**Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
November 1, 2013 thru April 30, 2014**

Big Rivers Electric Corporation
Wilson Station - Unit #1 - Coal/Pet Coke - 417MW Net
November 1, 2013 thru April 30, 2014

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November	F		11/1/2013 2:10	11/2/2013 10:28		32:18		Unit was removed from service to repair a leak in the superheater attemperator spray piping.	
December	F		12/4/2013 22:58	12/8/2013 11:42		84:44		Unit was removed from service to repair a tube leak in the "B" platen superheater section of the boiler.	
January	F		1/1/2014 9:43	1/6/2014 3:41		113:58		Unit was removed from service to repair an oil leak on the turbine front standard.	
	F		1/7/2014 23:16	1/12/2014 12:47		109:31		Unit was removed from service to repair a tube leak in the finishing superheater section of the boiler.	
	F		1/12/2014 12:48	1/12/2014 13:53		1:05		Unit tripped on high drum level immediately after it tied on due to sluggish response of the feed water regulator valve.	
February	No Outages								
March	No Outages								
April	No Outages								

Case No. 2014-00230

Witness: Lawrence V. Baronowsky

Attachment for Response to Staff Item 7

Page 11 of 11

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 8)** *List all existing fuel contracts categorized as long-term (i.e.,*
2 *one year or more in length). Provide the following information for each*
3 *contract:*

- 4
- 5 *a. Supplier's name and address;*
6 *b. Name and location of production facility;*
7 *c. Date when contract was executed;*
8 *d. Duration of contract;*
9 *e. Date(s) of each contract revision, modification, or*
10 *amendment;*
11 *f. Annual tonnage requirements;*
12 *g. Actual annual tonnage received since the contract's*
13 *inception;*
14 *h. Percent of annual requirements received during the*
15 *contract's term;*
16 *i. Base price in dollars per ton;*
17 *j. Total amount of price escalations to date in dollars per*
18 *ton; and*
19 *k. Current price paid for coal under the contract in dollars*
20 *per ton (i + j).*

21

22 **Response)** Please see the attached schedule.

23

24 **Witness)** Mark W. McAdams

25

Big Rivers Electric Corporation
Case No. 2014-00230
Long-Term Fuel Contract Information

Patriot Coal Sales 11021

A. NAME / ADDRESS:	Patriot Coal Sales, LLC. 12312 Olive Boulevard, Suite 400 St. Louis, Mo 63141		
B. PRODUCTION FACILITY:	Freedom and Grand Eagle Mines Henderson County, Kentucky Highland Mine Union County, Kentucky		
C. CONTRACT EXECUTED DATE:	October 24, 2011		
D. CONTRACT DURATION:	January 1, 2012 <i>through</i> December 31, 2015		
E. CONTRACT AMENDMENTS:	November 8, 2011 (<i>Amendment One</i>)		
F. ANNUAL TONNAGE REQUIREMENTS:	2012	-	964,000 tons
	2013	-	700,000 tons
	2014	-	700,000 tons
	2015	-	700,000 tons
G. ACTUAL TONNAGE:	2012	-	963,662 tons
	2013	-	671,818 tons
	2014	-	195,733 tons (<i>through April</i>)
H. PERCENT OF ANNUAL REQUIREMENTS:	2012	-	99.96 %
	2013	-	95.97 %
	2014	-	27.96 % (<i>through April</i>)
I. BASE PRICE:	Highland 2012	-	\$ 48.0992 per ton
	Patriot Blend 2012	-	\$ 47.0624 per ton
	Highland 2013	-	\$ 50.0251 per ton
	Highland 2014	-	\$ 52.0220 per ton
	Highland 2015	-	\$ 54.1013 per ton
J. ESCALATIONS TO DATE:	2 nd Quarter 2014	-	\$ 0.01 per ton
K. CURRENT CONTRACT PRICE:	Highland 2013	-	\$ 50.0251 per ton
	Highland 2014	-	\$ 52.0220 per ton
	Highland 2Q 2014	-	\$ 52.0320 per ton

Big Rivers Electric Corporation
Case No. 2014-00230
Long-Term Fuel Contract Information

Alliance Coal 11001

A. NAME / ADDRESS: Alliance Coal, LLC
1717 South Boulder Avenue
Tulsa, Oklahoma 74119

B. PRODUCTION FACILITY: Cardinal Mine
Hopkins County, Kentucky

C. CONTRACT EXECUTED DATE: July 7, 2010

D. CONTRACT DURATION: January 1, 2011 *through* December 31, 2013

E. CONTRACT AMENDMENTS: January 1, 2012 (*Amendment One*)
January 1, 2013 (*Amendment Two*)

F. ANNUAL TONNAGE REQUIREMENTS:

2011	-	600,000	tons
2012	-	750,000	tons
2013	-	750,000	tons

G. ACTUAL TONNAGE:

2011	-	644,307	tons
2012	-	749,772	tons
2013	-	749,647	tons

H. PERCENT OF ANNUAL REQUIREMENTS:

2011	-	107.38	%
2012	-	99.97	%
2013	-	99.95	%

I. BASE PRICE:

Quality A 2011	-	\$ 50.6904	per ton
Quality B 2011	-	\$ 51.6504	per ton
Quality C 2011	-	\$ 49.2461	per ton
Quality D 2011	-	\$ 47.7996	per ton
Quality A 2012	-	\$ 52.9704	per ton
Quality B 2012	-	\$ 53.9736	per ton
Quality C 2012	-	\$ 51.4622	per ton
Quality D 2012	-	\$ 49.6363	per ton
Quality A 2013	-	\$ 55.3536	per ton
Quality B 2013	-	\$ 56.4024	per ton
Quality C 2013	-	\$ 53.7773	per ton
Quality D 2013	-	\$ 51.8696	per ton
Quality E 2013	-	\$ 50.1603	per ton
Quality F 2013	-	\$ 49.1150	per ton
Quality G 2013	-	\$ 47.0254	per ton

J. ESCALATIONS TO DATE: None

**Big Rivers Electric Corporation
Case No. 2014-00230
Long-Term Fuel Contract Information**

Alliance Coal 11001 (*continued*)

K. CURRENT CONTRACT PRICE:	Quality A 2013	–	\$ 55.3536	per ton
	Quality B 2013	–	\$ 56.4024	per ton
	Quality C 2013	–	\$ 53.7773	per ton
	Quality D 2013	–	\$ 51.8696	per ton
	Quality E 2013	–	\$ 50.1603	per ton
	Quality F 2013	–	\$ 49.1150	per ton
	Quality G 2013	–	\$ 47.0254	per ton

Big Rivers Electric Corporation
Case No. 2014-00230
Long-Term Fuel Contract Information

Sebree Mining 11002

A. NAME / ADDRESS:	Sebree Mining, LLC <i>(formerly Allied Resources)</i> 15 New Steamport Road Sebree, KY 42455
B. PRODUCTION FACILITY:	Onton No. 9 Mine Webster County, Kentucky
C. CONTRACT EXECUTED DATE:	March 29, 2012
D. CONTRACT DURATION:	January 1, 2010 <i>through</i> December 31, 2016
E. CONTRACT AMENDMENTS:	April 29, 2011 <i>(Amendment One)</i> November 17, 2011 <i>(Amendment Two)</i> March 29, 2012 <i>(Contract Assigned from Allied Resources to Sebree Mining, LLC)</i> August 12, 2013 <i>(Amendment Three)</i> January 8, 2014 <i>(Amendment Four)</i> February 14, 2014 <i>(Amendment Five)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2010 – 650,000 tons 2011 – 500,000 tons 2012 – 750,000 tons 2013 – 960,000 tons 2014 – 800,000 tons 2015 – 890,000 tons 2016 – 900,000 tons
G. ACTUAL TONNAGE:	2010 – 664,320 tons 2011 – 500,614 tons 2012 – 748,127 tons 2013 – 919,426 tons 2014 – 383,271 tons <i>(through April)</i>
H. PERCENT OF ANNUAL REQUIREMENTS:	2010 – 102.20 % 2011 – 100.12 % 2012 – 99.75 % 2013 – 95.77 % 2014 – 47.91 % <i>(through April)</i>
I. BASE PRICE:	<u>Sebree Complex</u> Quality A 2012 – \$ 52.5500 per ton Quality B 2012 – \$ 50.6259 per ton Quality C 2012 – \$ 48.9946 per ton Quality D 2012 – \$ 46.0108 per ton

**Big Rivers Electric Corporation
Case No. 2014-00230
Long-Term Fuel Contract Information**

Sebree Mining 11002 (continued)

I. BASE PRICE: (continued)

Sebree Complex (continued)

Quality A 2013	-	\$ 54.9153	per ton
Quality B 2013	-	\$ 53.8668	per ton
Quality C 2013	-	\$ 52.1824	per ton
Quality D 2013	-	\$ 49.1854	per ton
Quality A 2014	-	\$ 57.6621	per ton
Quality B 2014	-	\$ 55.6405	per ton
Quality C 2014	-	\$ 53.8706	per ton
Quality D 2014	-	\$ 50.5978	per ton
Quality A 2015	-	\$ 61.6911	per ton
Quality B 2015	-	\$ 59.5694	per ton
Quality C 2015	-	\$ 57.7116	per ton
Quality D 2015	-	\$ 54.2146	per ton
Quality A 2016	-	No Price	
Quality B 2016	-	\$ 62.4897	per ton
Quality C 2016	-	\$ 60.7085	per ton
Quality D 2016	-	\$ 57.8600	per ton

Steamport Dock

Quality A 2012	-	\$ 51.9551	per ton
Quality B 2012	-	\$ 50.0269	per ton
Quality C 2012	-	\$ 48.3943	per ton
Quality D 2012	-	\$ 45.4102	per ton
Quality A 2013	-	\$ 54.3204	per ton
Quality B 2013	-	\$ 53.1133	per ton
Quality C 2013	-	\$ 51.4303	per ton
Quality D 2013	-	\$ 48.4308	per ton
Quality A 2014	-	\$ 57.0672	per ton
Quality B 2014	-	\$ 55.0415	per ton
Quality C 2014	-	\$ 53.2703	per ton
Quality D 2014	-	\$ 49.9994	per ton
Quality A 2015	-	\$ 61.0512	per ton
Quality B 2015	-	\$ 58.9399	per ton
Quality C 2015	-	\$ 57.0745	per ton
Quality D 2015	-	\$ 53.5832	per ton
Quality A 2016	-	No Price	
Quality B 2016	-	\$ 61.1910	per ton
Quality C 2016	-	\$ 60.4422	per ton
Quality D 2016	-	\$ 56.5598	per ton

J. ESCALATIONS TO DATE:

None

Big Rivers Electric Corporation
Case No. 2014-00230
Long-Term Fuel Contract Information

Sebree Mining 11002 (continued)

K. CURRENT CONTRACT PRICE:

		<u>Sebree Complex</u>	
Quality A 2013	—	\$ 54.9153	per ton
Quality B 2013	—	\$ 53.8668	per ton
Quality C 2013	—	\$ 52.1824	per ton
Quality D 2013	—	\$ 49.1854	per ton
Quality A 2014	—	\$ 57.6621	per ton
Quality B 2014	—	\$ 55.6405	per ton
Quality C 2014	—	\$ 53.8706	per ton
Quality D 2014	—	\$ 50.5978	per ton

		<u>Steamport Dock</u>	
Quality A 2013	—	\$ 54.3204	per ton
Quality B 2013	—	\$ 53.1133	per ton
Quality C 2013	—	\$ 51.4303	per ton
Quality D 2013	—	\$ 48.4308	per ton
Quality A 2014	—	\$ 57.0672	per ton
Quality B 2014	—	\$ 55.0415	per ton
Quality C 2014	—	\$ 53.2703	per ton
Quality D 2014	—	\$ 49.9994	per ton

Big Rivers Electric Corporation
Case No. 2014-00230
Long-Term Fuel Contract Information

Armstrong Coal 11023

A. NAME / ADDRESS:	Armstrong Coal Company, Inc. 7733 Forsyth Boulevard, Suite 1625 St. Louis, MO 63105
B. PRODUCTION FACILITY:	Parkway, Big Run, Ceralvo, East Fork, Kronos, Lewis Creek, and Equality Boot Mines Muhlenberg and Ohio Counties, Kentucky
C. CONTRACT EXECUTED DATE:	July 4, 2011
D. CONTRACT DURATION:	January 1, 2012 <i>through</i> December 31, 2015
E. CONTRACT AMENDMENTS:	None
F. ANNUAL TONNAGE REQUIREMENTS:	2012 - 350,000 tons 2013 - 400,000 tons 2014 - 800,000 tons 2015 - 875,000 tons
G. ACTUAL TONNAGE:	2012 - 351,376 tons 2013 - 401,613 tons 2014 - 317,580 tons (<i>through April</i>)
H. PERCENT OF ANNUAL REQUIREMENTS:	2012 - 100.39 % 2013 - 100.40 % 2014 - 39.70 % (<i>through April</i>)
I. BASE PRICE:	2012 - \$ 47.2512 per ton 2013 - \$ 48.4012 per ton 2014 - \$ 51.3682 per ton 2015 - \$ 54.5123 per ton
J. ESCALATIONS TO DATE:	1 st Quarter 2012 - \$ 0.8970 per ton 2 nd Quarter 2012 - \$ 0.9039 per ton 3 rd Quarter 2012 - \$ 0.8119 per ton 4 th Quarter 2012 - (\$ 0.1679) per ton 1 st Quarter 2013 - \$ 0.1840 per ton 2 nd Quarter 2013 - \$ 0.1863 per ton 3 rd Quarter 2013 - \$ 0.1564 per ton 4 th Quarter 2013 - (\$ 0.3473) per ton 1 st Quarter 2014 - (\$ 0.7245) per ton 2 nd Quarter 2014 - (\$ 0.4508) per ton
K. CURRENT CONTRACT PRICE:	2013 - \$ 48.5875 per ton 2014 - \$ 50.9174 per ton

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 9)**

- 2 a. *State whether Big Rivers regularly compares the price of*
3 *its coal purchases to those paid by other electric utilities.*
4 b. *If yes, state:*
5 (1) *How Big Rivers' prices compare with those of other*
6 *utilities for the review period. Include all prices*
7 *used in the comparison in cents per MMBtu.*
8 (2) *The utilities that are included in this comparison*
9 *and their locations.*

10

11 **Response)**

- 12 a. Yes, Big Rivers has compared the price of its coal purchases
13 with those paid by other electric utilities.
14 b.
15 (1) Big Rivers' coal pricing is competitive with that of its
16 comparison group for the review period. Attached hereto
17 are tables and charts, on both a ¢ per MMBTU and a \$ per
18 ton basis *plus* showing Big Rivers with and without
19 petcoke, providing the relevant supporting information.
20 (2) Utilities that are included in this comparison are Kentucky-
21 based companies. These utilities are identified on the
22 attached tables and charts.

23

24

25 **Witness)** Mark W. McAdams

**Big Rivers Electric Corporation
Case No. 2014-00230**

Cents per MMBTU (Big Rivers w/o Pet Coke)

Company	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14
Big Rivers Electric Corporation	221.01	215.83	234.58	222.96	227.04	221.61
Duke Energy - Kentucky	224.83	229.27	230.32	216.37	216.77	NR ¹
Louisville Gas and Electric Company	235.80	239.25	236.40	234.72	237.67	235.41
Kentucky Utilites Company	230.37	230.99	229.33	238.83	241.71	241.03
East Kentucky Power Cooperative	247.20	245.80	242.50	241.70	247.80	243.80
Kentucky Power	326.69	326.97	318.78	329.94	307.09	313.99

Dollars per Ton (Big Rivers w/o Pet Coke)

Company	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14
Big Rivers Electric Corporation	\$51.00	\$49.69	\$54.29	\$51.55	\$52.87	\$51.78
Duke Energy - Kentucky	\$51.20	\$52.47	\$52.84	\$50.87	\$50.75	NR ¹
Louisville Gas and Electric Company	\$54.27	\$55.41	\$54.76	\$54.81	\$55.52	\$54.53
Kentucky Utilites Company	\$51.43	\$51.70	\$51.30	\$53.62	\$54.18	\$54.86
East Kentucky Power Cooperative	\$56.15	\$55.70	\$55.20	\$54.79	\$56.50	\$55.32
Kentucky Power	\$79.68	\$78.08	\$77.59	\$76.91	\$73.15	\$75.16

Note(s):

1.- NR = No information reported for Duke Energy-Kentucky's East Bend Plant this time period.

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

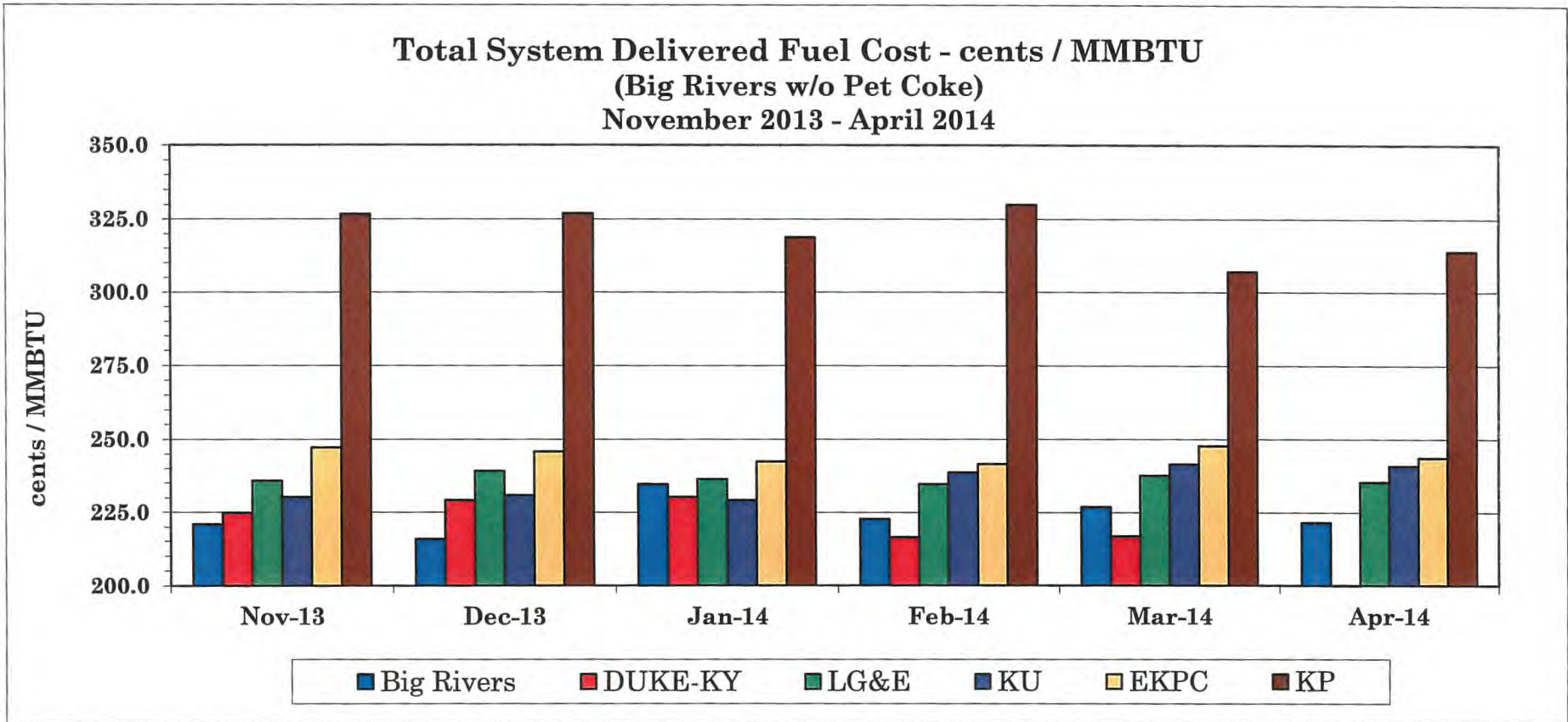
Case No. 2014-00230

Witness: Mark W. McAdams

Attachment for Response to Staff Item 9

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**Big Rivers Electric Corporation
Case No. 2014-00230**



Note(s):

1.- No information reported for Duke Energy - Kentucky's East Bend Plant in April 2014.

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

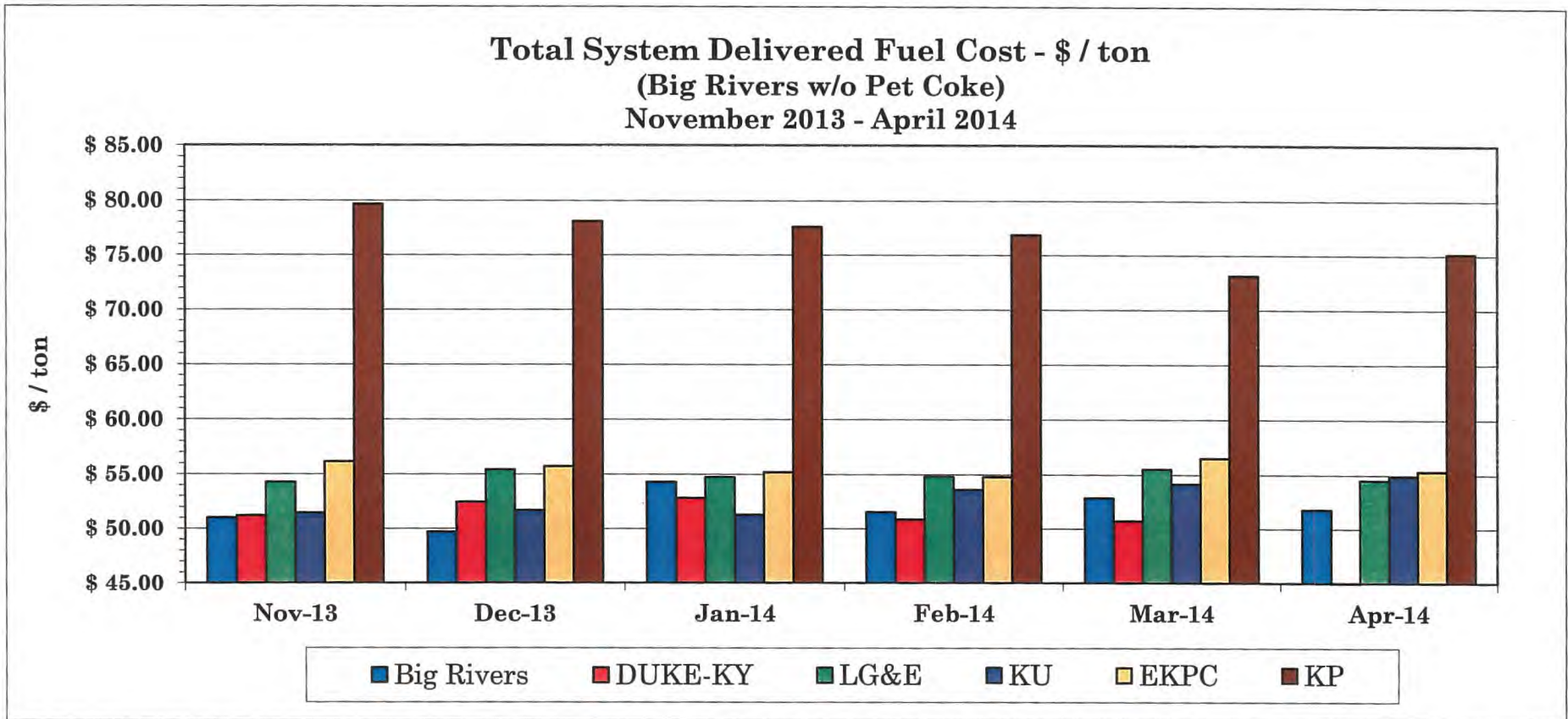
Case No. 2014-00230

Witness: Mark W. McAdams

Attachment for Response to Staff Item 9

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**Big Rivers Electric Corporation
Case No. 2014-00230**



Note(s):

1.- No information reported for Duke Energy - Kentucky's East Bend Plant in April 2014.

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

Case No. 2014-00230

Witness: Mark W. McAdams

Attachment for Response to Staff Item 9

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**Big Rivers Electric Corporation
Case No. 2014-00230**

Cents per MMBTU (Big Rivers w/ Pet Coke)

Company	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14
Big Rivers Electric Corporation	216.18	212.06	229.68	220.61	224.34	217.24
Duke Energy - Kentucky	224.83	229.27	230.32	216.37	216.77	NR ¹
Louisville Gas and Electric Company	235.80	239.25	236.40	234.72	237.67	235.41
Kentucky Utilites Company	230.37	230.99	229.33	238.83	241.71	241.03
East Kentucky Power Cooperative	247.20	245.80	242.50	241.70	247.80	243.80
Kentucky Power	326.69	326.97	318.78	329.94	307.09	313.99

Dollars per Ton (Big Rivers w/ Pet Coke)

Company	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14
Big Rivers Electric Corporation	\$50.93	\$49.67	\$53.94	\$51.41	\$52.65	\$51.59
Duke Energy - Kentucky	\$51.20	\$52.47	\$52.84	\$50.87	\$50.75	NR ¹
Louisville Gas and Electric Company	\$54.27	\$55.41	\$54.76	\$54.81	\$55.52	\$54.53
Kentucky Utilites Company	\$51.43	\$51.70	\$51.30	\$53.62	\$54.18	\$54.86
East Kentucky Power Cooperative	\$56.15	\$55.70	\$55.20	\$54.79	\$56.50	\$55.32
Kentucky Power	\$79.68	\$78.08	\$77.59	\$76.91	\$73.15	\$75.16

Note(s):

1.- NR = No information reported for Duke Energy-Kentucky's East Bend Plant this time period.

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

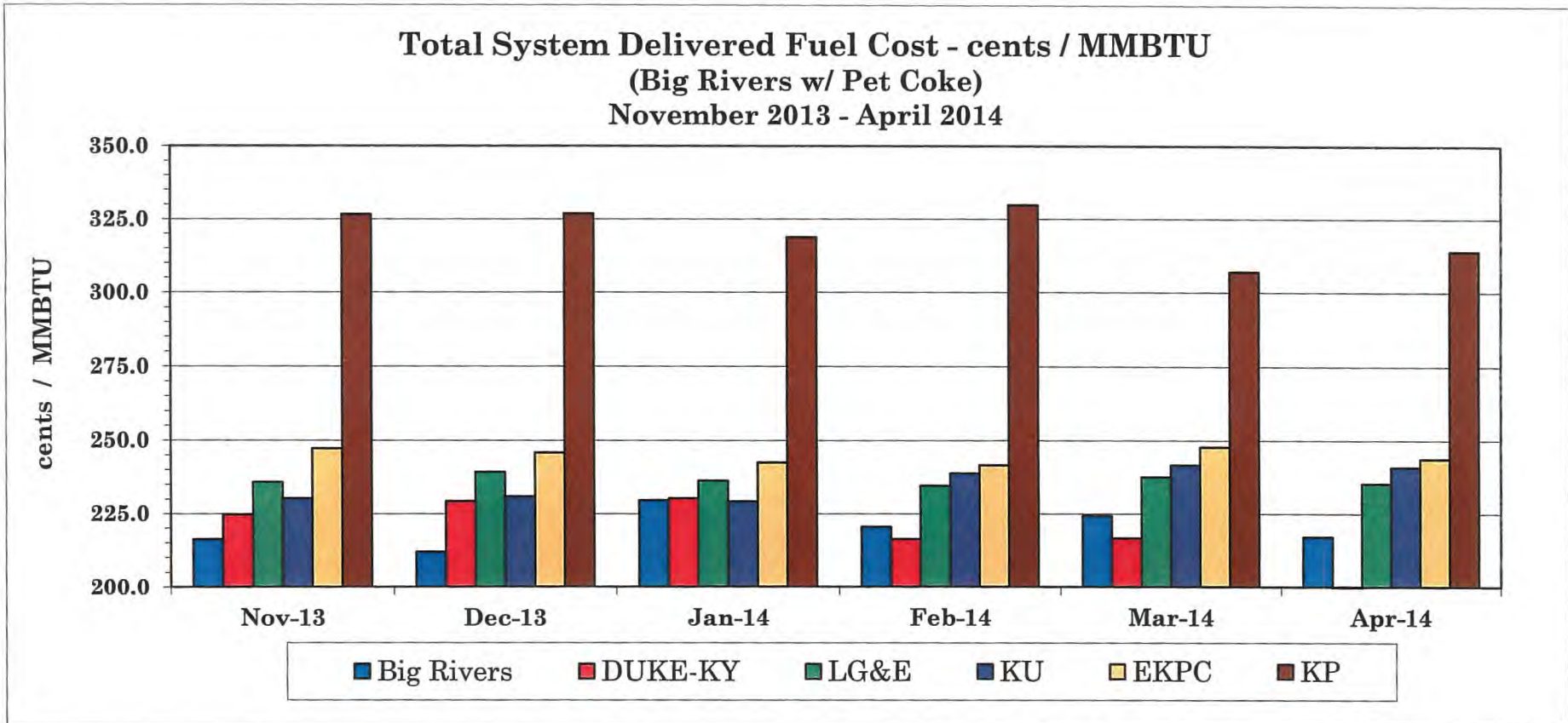
Case No. 2014-00230

Witness: Mark W. McAdams

Attachment for Response to Staff Item 9

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**Big Rivers Electric Corporation
Case No. 2014-00230**



Note(s):

1.- No information reported for Duke Energy - Kentucky's East Bend Plant in April 2014.

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

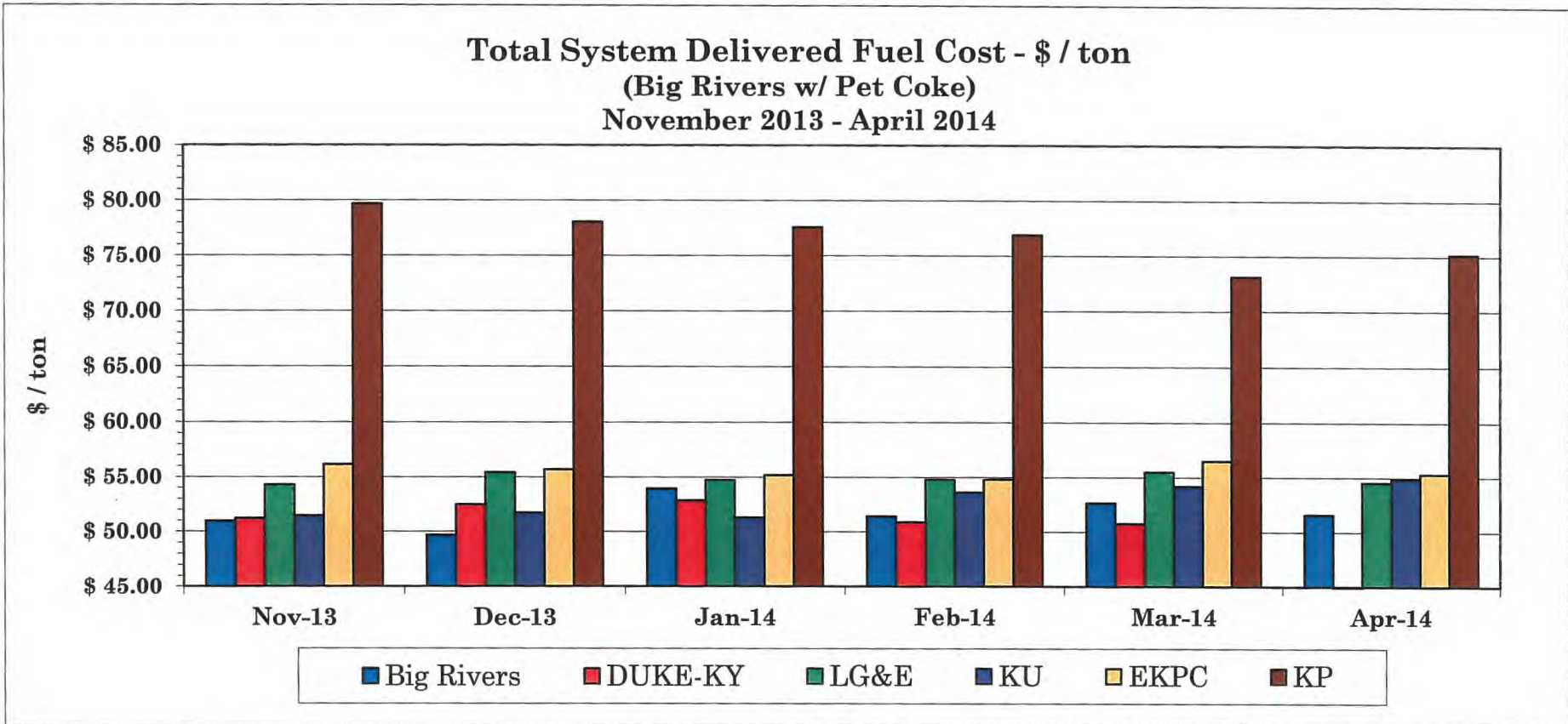
Case No. 2014-00230

Witness: Mark W. McAdams

Attachment for Response to Staff Item 9

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**Big Rivers Electric Corporation
Case No. 2014-00230**



Note(s):

- 1.- No information reported for Duke Energy - Kentucky's East Bend Plant in April 2014.

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

Case No. 2014-00230

Witness: Mark W. McAdams

Attachment for Response to Staff Item 9

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BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 10)** *State the percentage of Big Rivers' coal, as of the date of this*
2 *Order, that is delivered by:*

3

- 4 *a. Rail;*
5 *b. Truck; or*
6 *c. Barge.*

7

8 **Response)** For the period from November 1, 2013, through April 30, 2014, Big
9 Rivers' coal delivery percentages are as follows:

10

- 11 *a. Rail – None;*
12 *b. Truck – 53% (Coal only); 49% (Coal plus Pet Coke);*
13 *c. Barge – 47% (Coal only); 51% (Coal plus Pet Coke).*

14

15

16 **Witness)** Mark W. McAdams

17



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 11)**

- 2 a. *State Big Rivers' coal inventory level in tons and in*
3 *number of days' supply as of April 30, 2014. Provide this*
4 *information by generating station and in the aggregate.*
5 b. *Describe the criteria used to determine number of days'*
6 *supply.*
7 c. *Compare Big Rivers' coal inventory as of April 30, 2014 to*
8 *its inventory target for that date for each plant and for*
9 *total inventory.*
10 d. *If actual coal inventory exceeds inventory target by ten*
11 *days' supply, state the reasons for excessive inventory.*
12 e. (1) *State whether Big Rivers expects any significant*
13 *changes in its current coal inventory target within*
14 *the next 12 months.*
15 (2) *If yes, state the expected change and the reasons for*
16 *this change.*

17

18 **Response)**

- 19 a. As of April 30, 2014, Big Rivers' generating stations individually
20 and in the aggregate had the following inventory levels and
21 days' supply.

22

23

24

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1
2
3
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6
7

Total System/Station	Inventory Level (In Tons) ¹	Number of Days' Supply ²	Duration (In Days)	Preceding 6 Months Burn (In Tons)
Big Rivers Electric System	294,704.52	17	160	2,785,487.11
Reid Station ³	8,906.92	16	107	60,777.16
Station II ⁴	102,385.50	45	176	401,875.85
Green Station ⁵	147,221.67	29	164	818,325.45
Coleman Station ⁶	3,267.85	1	163	765,122.25
Wilson Station ⁷	32,922.58	7	167	739,386.40

- b. Days Burn = [{ Current Inventory (In Tons) / Preceding 6 Months Burn (In Tons) }] x Duration (In Days)
- c. Big Rivers Electric Corporation's Target Supply is the following range for each Station in days.

**Big Rivers Electric Corporation
Coal Inventory Target Ranges**

Reid Station	16 – 20 Days
Station II	60 – 80 Days
Green	30 – 60 Days
Coleman	25 – 45 Days
Wilson	30 – 60 Days
Total System	30 – 60 Days

8
9
10
11
12
13

Due to changes in the status of certain generating stations arising from the termination of the Smelter contracts, Big Rivers notes that, in the next FAC review, the target range for Station II will be 30 – 60 days while the target for Coleman will be 0 days.

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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**Response to Commission Staff's Request for Information
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August 27, 2014

- 1 d. The actual inventory, for each station and in the aggregate, does
2 not exceed the inventory target by ten (10) days.
3 e.
4 (1) Yes. Big Rivers anticipates a change in coal inventory held
5 and modification of its current inventory target(s) within
6 the next twelve (12) months.
7 (2) Inventory was reduced at Coleman Station and Wilson
8 Station as a result of the Notice of Termination from
9 Century Aluminum-Hawesville effective August 20, 2013,
10 and the notice of termination from Century-Sebree,
11 formerly Alcan Aluminum, effective January 31, 2014.
12
13

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
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August 27, 2014

1

Footnotes –

1. Green Station had a petcoke inventory level of 19,360.04 tons as of April 30, and has a target blend of 16 to 18% with Green coal. Wilson Station had a petcoke inventory level of 2,680.25 tons as of April 30, and has a target blend of 8 to 10% with Wilson coal.
2. Number of days' supply is rounded to reflect whole days. Including petcoke would result in 29 days at Green Station and in 7 days at Wilson Station.
3. Reid Station Unit 1 was in standby reserve 71 days. Reid 1 was out of service 3 days due to unscheduled outages. The duration of generation was reduced to 107 days and Reid had a 16 day supply of compliance coal at April 30, 2014.
4. Station II Units 1 and 2 had unscheduled maintenance of 93.3 hours and scheduled maintenance of 24.4 hours and Unit 1 had a planned outage of 119.4 hours in April 2014 that extended into May. These hours were equivalent to 5 days. The duration of generation was reduced to 176 days.
5. Green Station Units 1 and 2 had unscheduled and maintenance hours of 295.0 hours. Also, Green 1 had a planned outage of 538 hours. These hours were equivalent to 17 days. The duration of generation was reduced to 164 days.
6. Coleman Station Units 1, 2 and 3 had 1,151.0 unscheduled hours during the review period and 71.6 hours of scheduled maintenance hours for a total of 1,222.66 hours out-of-service. Also, there were reserve hours of 94.8. These hours were equivalent to 18 days. The duration of generation was reduced to 163 days. There was one day of supply at the end of April 2014 and all remaining inventory will be moved to Green Station.
7. Wilson Unit 1 had unscheduled maintenance hours for a total of 341.6 hours out of service. These hours were equivalent to 14 days. The duration of generation was reduced to 167 days. The unit had an inventory supply of 7 days at the end of April 2014 but efforts have been underway to increase the inventory supply back to a 30 day level.

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Witness) Mark W. McAdams

5



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 12)**

- 2 a. *State whether Big Rivers has audited any of its coal*
3 *contracts during the period from November 1, 2013,*
4 *through April 30, 2014.*
- 5 b. *If yes, for each audited contract:*
- 6 (1) *Identify the contract;*
7 (2) *Identify the auditor;*
8 (3) *State the results of the audit; and*
9 (4) *Describe the actions that Big Rivers took as a result*
10 *of the audit.*

11
12 **Response)**

- 13 a. Big Rivers has audited one of its coal supply agreements during
14 the period from November 1, 2013, through April 30, 2014.
- 15 b.
- 16 (1) Alliance Coal, LLC (BRE-11-001);
17 (2) Integrity Development Consultants, Inc.;
- 18 (3) The audit was performed pursuant to a governmental
19 imposition claim of \$191,329.00 made by Alliance in regard
20 to rock dust and labor, fire suppression tests, examination
21 rules, roof control, and permit matters (Kentucky Pollutant
22 Discharge Elimination System ("KPDES")); and
- 23 (4) Upon review by an independent mine engineering
24 consultant, Integrity Development, the governmental
25 imposition claim was determined relatively complete,

BIG RIVERS ELECTRIC CORPORATION

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1 methodology consistent with previous claims, and a good
2 portion, but not all of the claim, appeared to be valid
3 (accurate and reasonable) and substantially supported.
4 Pursuant to the findings of the independent mine
5 engineer's audit, and obligations within the contractual
6 agreement between Big Rivers and Alliance Coal, LLC, the
7 claim for governmental imposition was closed via a
8 negotiated settlement value of \$150,000.00.

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Witness) Mark W. McAdams

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BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 13)**

- 2 a. *State whether Big Rivers has received any customer*
3 *complaints regarding its FAC during the period from*
4 *November 1, 2013, through April 30, 2014.*
5 b. *If yes, for each complaint, state:*
6 1. *The nature of the complaint; and*
7 2. *Big Rivers' response.*

8

9 **Response)**

- 10 a. Big Rivers has received no customer complaints regarding
11 its FAC during the period from November 1, 2013, through April
12 30, 2014.
13 b. Not Applicable.

14

15

16 **Witness)** Nicholas R. Castlen

17



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 14)**

- 2 a. *State whether Big Rivers is currently involved in any*
3 *litigation with its current or former coal suppliers.*
4 b. *If yes, for each litigation:*
5 (1) *Identify the coal supplier;*
6 (2) *Identify the coal contract involved;*
7 (3) *State the potential liability or recovery to Big*
8 *Rivers;*
9 (4) *List the issues presented; and*
10 (5) *Provide a copy of the complaint or other legal*
11 *pleading that initiated the litigation and any*
12 *answers or counterclaims. If a copy has previously*
13 *been filed with the Commission, provide the date on*
14 *which it was filed and the case in which it was filed.*
15 c. *State the current status of all litigation with coal*
16 *suppliers.*

17

18 **Response)**

- 19 a. No.
20 b.
21 (1) – (5)
22 Not applicable.
23 c. On July 15, 2014, Big Rivers settled the lawsuit arising out of
24 Big Rivers' termination of a coal supply agreement with Oxford
25 Mining Company – Kentucky, LLC ("Oxford"). Big Rivers

BIG RIVERS ELECTRIC CORPORATION

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1 terminated the agreement because the coal delivered by Oxford
2 failed to meet the specifications under the contract. Under the
3 terms of the settlement, the parties will release their claims
4 against each other, and the pending litigation will be dismissed
5 with prejudice.

6 Big Rivers previously provided background information
7 about this lawsuit in an attachment to its response, dated
8 September 11, 2012, to Item 14b.(5) of the Commission Staff's
9 Request for Information, dated August 22, 2012, in Case No.
10 2012-00323.

11
12
13
14

Witness) Mark W. McAdams

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 15)**

2 a. *During the period from November 1, 2013, through April*
3 *30, 2014, have there been any changes to Big Rivers'*
4 *written policies and procedures regarding its fuel*
5 *procurement?*

6 b. *If yes,*

7 (1) *Describe the changes;*

8 (2) *Provide the written policies and procedures as*
9 *changed;*

10 (3) *State the date(s) the changes were made; and*

11 (4) *Explain why the changes were made.*

12 c. *If no, provide the date Big Rivers' current fuel*
13 *procurement policies and procedures were last changed,*
14 *when they were last provided to the Commission, and*
15 *identify the proceeding in which they were provided.*

16

17 **Response)**

18 a. Yes.

19 b.

20 (1) Big Rivers revised the following policies:

21 i. Policy No. 105 – Energy-Related Transaction Authority
22 Policy adding “date last reviewed line” to page header and
23 revising Section 4 to conform with Policy No. 105 -
24 Appendix A to ERTA Policy.

BIG RIVERS ELECTRIC CORPORATION

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- 1 ii. Policy No. 105 - Appendix A to ERTA Policy updating
2 aggregate limits for VP Energy Services, increasing offer
3 price caps for capacity, updating VP Energy Services gas
4 authorization, changing "Power Portfolio Optimization
5 Analyst" to "Senior Power Portfolio Optimization
6 Analyst," and replacing "Manager Power Supply &
7 Market Operations" with "Director Power Supply &
8 Market Operations."
9 iii. Policy No. 120 – Fuel Procurement Policies and
10 Procedures adding a "date last reviewed line" to the page
11 header, adding section headers, changing "mmBTU" to
12 "gallon," and replacing "VP Production" with "Chief
13 Operating Officer."
14 (2) Clean and redline versions of Big Rivers' Policy No. 105 –
15 Energy-Related Transaction Authority Policy, Policy No.
16 105 - Appendix A to ERTA Policy, and Policy No. 120 – Fuel
17 Procurement Policies and Procedures are attached hereto.
18 (3) The aforementioned changes were effective on:
19 i. February 20, 2014, for Policy No. 105 – Energy-Related
20 Transaction Authority Policy.
21 ii. November 4, 2013, for Policy No. 105 – Appendix A to
22 ERTA Policy.
23 iii. February 20, 2014, for Policy No. 120 – Fuel Procurement
24 Policies and Procedures.

BIG RIVERS ELECTRIC CORPORATION

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1 (4) The aforementioned changes were generally made to reflect
2 expanded authority for Lindsay N. Barron, Big Rivers' Vice
3 President Energy Services; promotion of Natalie Hankins to
4 Senior Power Portfolio Analysts; assignment of Wayne
5 O'Bryan to the Director Power Supply & Market
6 Operations; and recognition of Sharla Austin-Darnell's role
7 as Director Risk Management and Strategic Planning.

8 c. Not Applicable.

9

10 **Witnesses)** Mark W. McAdams and

11 Wayne O'Bryan

**Policy No. 105 –
Energy-Related Transaction Authority Policy**



Your Touchstone Energy® Cooperative

BOARD POLICY

Policy Number 105

Original Effective Date	06/15/2007	Approved By: BOARD
Original Approval Date	06/15/2007	
Date Last Reviewed		
Date Last Revised	03/21/2014	

1. Policy Purpose

The purpose of this policy is to define the authority granted by the Big Rivers Electric Corporation (“Big Rivers”) Board of Directors (“Board”) to the President & Chief Executive Officer (“CEO”) to execute, or to delegate authority to execute energy-related transactions. Furthermore, it sets forth clarity and empowerment among those with transaction authority and is designed to encourage communication among individuals with transaction authority and the Board.

2. Objective

The objective of Big Rivers’ Energy Related Transaction Authority Policy is to define:

- Who has authority to execute transactions,
- The commodities and products that can be transacted,
- The authorized lead-time and term for each transaction,
- The authorized maximum price and volume,
- Counterparty contract and credit requirements,
- The process for approving new commodities, products or locations,
- Big Rivers’ intention regarding hedging and speculating,
- Other relevant factors associated with due diligence in authorizing transactions to be executed.

3. Procedural Requirements

The following defines the procedural requirements that apply to all commodities and products transacted pursuant to this policy.


Execution Authority

Execution Authority is outlined by commodity in the authority matrix sections found below. All column limits in these matrices are applied independently of one another for each authority level, in that no individual column limit may be exceeded without authorization, regardless of whether a transaction does not exceed another column limit for that same authority level. Limits for each level of authority are cumulative, and include all column limits up to and including that level. The authority granted in this policy should not violate any other policy limits.

The transaction limits apply to both purchases and sales. Daily limits are applied to gross amounts transacted in total for the day, and not to purchases and sales netted together.

This policy identifies Board-authorized levels for the CEO and explicitly gives the CEO the authority to delegate authority levels to Big Rivers’ staff and ACES Power Marketing (“APM”). The CEO has the authority to modify delegated authority levels (noted in Appendix A) at his sole discretion as long as the delegated authority does not exceed his own authority per this policy. All delegated authority levels below the VP Production level will be recommended by the VP Production and approved by the CEO.



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Contract Requirements

Transactions with counterparties shall only be permitted if Big Rivers has either:

- An active, valid, and executed agreement enabling such transaction activity with that counterparty,
- Long-form confirmations may be used as a valid agreement in lieu of a permanent agreement, when necessary if approved in writing by the Big Rivers CEO.

Credit Requirements

Credit limits for each counterparty shall not be intentionally exceeded. *(Note: Since credit exposures are a function of not only positions transacted, but also a function of market pricing and volatility, credit exposure to counterparty may unintentionally exceed a credit limit purely due to changes in the forward market).*

Entering into unsecured transactions with a counterparty that has total credit exposure greater than or equal to its open line of credit and the total of any security currently provided will not be allowed unless approved in writing by the Big Rivers CEO.

Credit Sleeving

All sleeving transactions for credit purposes shall be approved by the CEO. *(Note: Sleeving is an arrangement where a more financially reputable entity acts as middleman for a smaller, undercapitalized entity in the purchase or sale of power.)*

Contract Sleeving

This policy does not prohibit Big Rivers from being positioned between another member or customer of APM and an external counterparty in order to bridge a contract gap that exists. The sleeve must:


- Be only for physical power, transmission or natural gas, not transportation,
- Be only for terms of one month or less.

Contract sleeving on behalf of Big Rivers is approved when it is either the only or the most economical path to pursue at the discretion of APM, with prompt after-the-fact notice to the Big Rivers VP Production.

Transaction Communications

All communications for bilateral electric power transactions must be transacted via a recorded communication method. Examples include, but are not limited to, voice recorded communication land or



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cellular phone, instant messaging or via an online broker account. Recorded communications must be maintained and controlled by personnel who are independent of the transaction function.

Deal Capture

Any transactions executed by a Big Rivers employee must be promptly forwarded to APM after the deal execution.

Speculation

Speculation refers to a purchase or sales transaction in which the intent was to realize a profit without taking physical delivery. No speculative transaction activities shall be permitted, and no speculative transaction positions shall be initiated. Transactions will be permitted only for purposes of hedging and portfolio optimization.

Non-Standard Products

The Board must pre-approve any transaction that involves commodities or products not listed in this policy.

Transactions Requiring Board Approval

Transactions which meet any of the following criteria must be pre-approved by the Board prior to execution:

- The transaction is a new commodity or within the list of commodities not previously transacted by Big Rivers,
- The transaction is at a location in which no transactions are permitted,
- The transaction is for something other than: physical spot or forward electricity, natural gas, fuel oil, solid fuel, ancillary services, capacity, power transmission, financial transmission rights, gas transportation, gas imbalance and storage, solid fuel transportation, exchange transacted energy products, over-the-counter (OTC) financial energy transactions, OTC energy options, federal SO₂ or NO_x emission allowances, renewable energy credits or a unit outage insurance product.

Examples of new instruments would include the use of derivatives with different risk characteristics or the use of derivatives to implement different business strategies or goals. New instruments or locations would also include those instruments or locations that may be transacted on a “one-off” basis, which would be implementation of a derivative instrument or entry into a commodity market that, despite the anticipation of being transacted just once, would still fit the definition of a new instrument or location.

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The purpose of defining a process for such transactions as noted above is to ensure that the exposures associated with them are thoroughly reviewed and understood by the Board and appropriate transaction

controls are in place. The Board must approve the use of such transactions prior to execution using the process defined below:

- a) Transaction Proposal - The proposal is the responsibility of the person or business group proposing the transaction. The proposal should address the business need, risks, transaction controls, valuation methodology, accounting methodology, operations workflow/ methodology, and assessment of legal and regulatory issues.
- b) Board Review - The Board will perform a review of the benefits and risks of the proposed transaction. The Board will assess the proposed transaction and make a determination whether to add the proposed transaction to the approved list.
- c) Approval (Pilot Program) – The Board may approve limited use of the proposed transaction to ensure that proper controls are in place to monitor the activity. The Board may approve the proposed transaction without instituting a Pilot Program if the proposed transaction is going to be used once (one off), where it would not be prudent to test it in a shorter time frame or smaller quantity due to constraints such as liquidity or length of term of product. The Board will use more scrutiny in approval of one-off transactions.



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4. Bilateral Electric Power and Transmission Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for power and power transmission transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits	
		Term	Lead Time	MW Size	\$/MWH	Total Volume MWH	Total \$	Total Volume MWH	Total \$
Board	Electric Power and Transmission	No Limit	No Limit	No Max.	No Max.	No Max.	No Max.	No Max.	No Max.
CEO	Electric Power and Transmission	> 1 Year	≤ 2 Years	50	\$150	21,600	\$10.8 million	1,800,000	\$110 million
		≤ 3 Years		No Max.	No Max.				
		≤ 1 Year							

Power Authority Matrix Explanations

- Transaction limits represent the MW volume per hour and dollars/MWH for each transaction executed.
- Per Delivery Day Limits represent the total MWH volume and dollars for all transactions delivered in a given transaction day.
- Aggregate Limits represent the sum total MWH volume and dollars for all forward transactions.
- Lead time represents the time period from the date the transaction is executed to the start of the transaction.
- Authorized products include electric power, both forwards and options, transmission, including both physical and financial derivatives. Options may only be entered into by the Big Rivers CEO or his designee.
- Authority for PJM and MISO products is defined in the authority matrices below.



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Delivery Locations

Transactions at delivery locations outside the eastern interconnect are not permitted. Transaction at delivery locations that are normal to the daily course of business for Big Rivers, to the extent transmission is available, are authorized as follows:

Unrestricted Delivery Locations

- SERC Reliability Region
- MISO
- PJM
- RFC Reliability Region
- SPP

Transaction at any other delivery locations within the eastern interconnection shall be restricted as follows:

Restricted Delivery Locations

Other eastern interconnection locations only with approval by the Big Rivers CEO.

Firmness of Power

The product firmness of all transactions must be provided for in an executed agreement between Big Rivers and the appropriate counterparty. Sales commitments must never be more firm than the supply source, including the purchase side of back-to-back sales, swaps, sleeves or spreads unless the Big Rivers CEO gives explicit written authority to sell power that is more firm than the supply source. Energy purchased as firm liquidated damages may be resold as such.

Transmission Firmness and Volume

Transmission purchases need to be of equal firmness and volume to the energy component that such transmission purchase is associated with, unless pre-approved otherwise by the Big Rivers CEO. (Note: Purchasing small percentages of additional transmission to cover transmission losses is permitted.) In addition, transmission may be reserved but not utilized if an energy schedule is not confirmed prior to scheduling deadlines outside of Big Rivers' or APM's control. When this occurs it is not considered a violation of this policy.

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5. MISO Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for MISO products.

		MISO Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
Board	All MISO Products	No Limit	No Limit	No Max	No Max
CEO	Generation Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 3 Years	≤ 3 Years	500	
	Financial Transmission Rights	≤ 4 Years	≤ 4 Years	425	\$20
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
Imports/Exports					

MISO Authority Matrix Explanations

- Virtual transaction award limits are per each bid/offer nodal point. Virtual purchase awards and virtual sales awards are monitored separately.
- Imports and exports are per location and are monitored separately.
- Generation Award Limits are per generating unit.
- Demand Award Limits are per each load nodal point.
- Limits for Ancillary Service Awards apply to the Regulation and Operating (Spinning and Supplemental) Reserve Market only.
- Capacity limits apply to bilateral transactions executed to meet MISO resource adequacy requirements such as MISO Aggregate Planning Resource Credits (APRC) as well as capacity transacted via the MISO Capacity Auction.
- Only Financial Transmission Rights that are bought and sold via the annual and monthly auctions or in the secondary market are monitored per the limits above. Participation in the Annual Allocation of financial transmission rights is not considered a transaction subject to this Policy.
- Delivery lead time represents the time period between trade execution and start of flow.

Note that all MISO ISO day-ahead transactions, such as price-sensitive offers and bids for importing and exporting from MISO, are financially firm. Hence an exception from the firmness of power for adjustments to these day ahead transactions intraday is acceptable due to the fact that these adjustments are hourly and non-firm.



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6. PJM Transaction Authority (Non-Bilateral)

The following outlines transaction limits, definitions, and procedural requirements for PJM products.

Title	Product	PJM Per Transaction Limits (up to)			
		Delivery Lead Time	Term	MW Size	\$/MWh
Board	All PJM Products	No Limit	No Limit	No Max	No Max
CEO	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 4 Years	≤ 4 Years	425	\$20
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	No Max	PJM Price Cap
Imports/Exports					

PJM Authority Matrix Explanations

- Virtual transaction award limits are per each bid/offer nodal point. Incremental purchase awards and decremental sales awards are monitored separately.
- Imports and exports are per location and are each monitored separately.
- Only financial transmission rights that are bought and sold via the annual and monthly auctions or in the secondary market are monitored per the limits above. Participation in the Annual Allocation of financial transmission rights is not considered a transaction subject to this Policy.

Note that PJM RTO day-ahead transactions, such as price-sensitive offers and bids for importing and exporting from PJM are financially firm. Hence an exception from the firmness of power for adjustments to these day ahead transactions intraday is acceptable due to the fact that these adjustments are hourly and non-firm.

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7. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	Physical Volume per Day MMBtu	\$/ MMBtu	Physical Volume MMBtu	Total \$	Total Physical Volume MMBtu	Total \$
Board	Gas Products	No Limit	No Limit	No Max.	No Max.	No Max.	No Max.	No Max.	No Max.
CEO	Physical	> 1 Year ≤ 2 Years	≤ 2 Years	25,000	\$15	25,000	\$375,000	1.2 million	\$18 million
		≤ 1 Year		No Max.	No Max.	No Max.	No Max.		

Gas Authority Matrix Explanations

- Transaction limits represent the physical MMBtu volume per day and dollars/MMBtu for each transaction executed.
- Per delivery day limits represent the total physical MMBtu volume and dollars for all transactions delivered in a given day.
- Aggregate limits represent the total physical MMBtu volume and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.
- The dollar limits are based upon commodity gas only and do not include transportation, however, the term, lead time, and volume limits do apply to transportation.
- Gas products include physical gas, as well as transportation, imbalance and storage. The above authority matrix applies to both exchange transacted and OTC derivative products.

Gas Firmness



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The product firmness of all transactions must be provided for in an executed agreement between Big Rivers and the appropriate counterparty. Sales commitments of Gas must never be more firm than the Gas supply source unless pre-approved by the Big Rivers CEO.

Transportation Firmness and Volume

Transportation purchases need to be of equal firmness and volume to the Gas component that such transportation purchase is associated with, unless pre-approved otherwise by the Big Rivers CEO.

Delivery Locations

Gas transactions may only be executed at the following locations:

- Pipelines and hubs that serve Big Rivers' gas powered generation unit(s).

Physical Gas transactions may only be executed at other locations upon approval of the Big Rivers CEO and such transactions must support the hedging needs of Big Rivers.



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Date Last Revised	<u>03/21/2014</u>	

8. Fuel Oil Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for physical fuel oil transactions.

Fuel oil hedging will be conducted to hedge price risk associated with fuel oil used for plant start-up or to hedge potential fuel oil or diesel fuel price risk contained within solid fuel contracts.

<u>Title</u>	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical - Volume Gallons	\$/Gallon	Total Physical - Volume Gallons	Total \$
Board	Physical Fuel Oil	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Fuel Oil	> 1 Year	≤ 2 Years	1,000,000	\$6	6,000,000	\$36 million
		≤ 3 Years		No Max	No Max		
		≤ 1 Year					

Fuel Oil Authority Matrix Explanations

- Transaction limits represent the total gallons and dollars/gallon for each transaction executed.
- Aggregate limits represent the sum total gallon volume and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



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Date Last Revised	<u>03/21/2014</u>	

9. Solid Fuel Transaction Authority


The following outlines transaction limits, definitions, and procedural requirements for solid fuel transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
Board	Physical Solid Fuel	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Solid Fuel	> 3 Months ≤ 3 Years	≤ 2 Years	1,500,000	\$2.50	2 million	\$120 million
		≤ 3 Months		200,000	\$2.85		

Solid Fuel Authority Matrix Explanations

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars/MMBtu for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



Your Touchstone Energy® Cooperative 

BOARD POLICY

Policy Number 105

Original Effective Date	<u>06/15/2007</u>	Approved By: BOARD
Original Approval Date	<u>06/15/2007</u>	
Date Last Reviewed	<u> </u>	
Date Last Revised	<u>03/21/2014</u>	

10. Solid Fuel Transportation Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for solid fuel transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board	Barge, Rail or Truck Transportation	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Barge, Rail or Truck Transportation	> 1 Year ≤ 3 Years	≤ 2 Years	3 million	\$9	6 million	\$54 million
		≤ 1 Year		No Max	No Max		

Solid Fuel Transportation Authority Matrix Explanations

- Authorized products include barge, rail and truck transportation transactions.
- Per transaction limits represent the total quantity in tons and dollars/ton for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



BOARD POLICY

Policy Number 105

Original Effective Date	<u>06/15/2007</u>	Approved By: BOARD
Original Approval Date	<u>06/15/2007</u>	
Date Last Reviewed	<u> </u>	
Date Last Revised	<u>03/21/2014</u>	

11. Emission Allowances Transaction Authority*

The following outlines transaction limits, definitions, and procedural requirements for emissions transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board	Federal SO ₂ and NO _x Emission Allowances	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Federal SO ₂ Emission Allowances	> 1 Year ≤ 2 Years	≤ 2 Years	5,000	\$500	20,000	\$10 million
		≤ 1 Year		No Max	No Max		
	Federal NO _x Emission Allowances	> 1 Year ≤ 2 Years		2,500	\$2,500	12,500	\$30 million
		≤ 1 Year		No Max	No Max		

Emission Allowance Authority Matrix Explanations

- The authority matrix above represents authority for SO₂ and NO_x emission allowances.
- Per transaction limits represent the total quantity in tons and dollars/ton for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

*Per Appendix A of the Kentucky Public Service Commission order dated March 6, 2009 in case 2007-00455 Big Rivers commits to not sell SO₂ allowances in its inventory (excluding the 14,000 SO₂ allowances acquired in conjunction with the Unwind Transaction) unless the sale is cost-effective based on a written policy which reflects short- and long-term allowance needs and prices.



Your Touchstone Energy® Cooperative

BOARD POLICY

Policy Number 105

Original Effective Date	06/15/2007	Approved By: BOARD
Original Approval Date	06/15/2007	
Date Last Reviewed		
Date Last Revised	03/21/2014	

12. Limestone Reagent Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board of Directors	Physical Limestone Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Limestone Reagent	> 3 Months ≤ 3 Years	≤ 2 Years	750,000	\$20	1.50 million	\$30 million
		≤ 3 Months		No Max	No Max		

Limestone Reagent Authority Matrix Explanations

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



Your Touchstone Energy® Cooperative 

BOARD POLICY

Policy Number 105

Original Effective Date	<u>06/15/2007</u>	Approved By: BOARD
Original Approval Date	<u>06/15/2007</u>	
Date Last Reviewed	<u> </u>	
Date Last Revised	<u>03/21/2014</u>	

13. Lime Reagent Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for lime reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board of Directors	Physical Lime Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Lime Reagent	> 3 Months ≤ 3 Years	≤ 2 Years	650,000	\$125	650,000	\$81 million
		≤ 3 Months		No Max	No Max		

Lime Reagent Authority Matrix Explanations

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



Your Touchstone Energy® Cooperative

BOARD POLICY

Policy Number 105

Original Effective Date	06/15/2007	Approved By: BOARD
Original Approval Date	06/15/2007	
Date Last Reviewed		
Date Last Revised	03/21/2014	

14. Acknowledgements

Clear Authority and Staff and APM Authority Delegations

Where authority is further downward delegated, it must be approved by written signature of the next authority level up prior to any execution. In no case will the delegation of authority to Big Rivers staff or APM exceed that of the Big Rivers CEO.

Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Vice President of Governmental Relations and Enterprise Risk Management who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party (ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, APM employees are governed by the ACES Power Marketing Trading Sanctions Policy).

Policy Effective

This Transaction Authority Policy is in effect upon the Board’s approval and shall remain in effect until a revised policy has been approved by the Board.


Responsibility

It shall be the responsibility of the Board, the CEO, the Big Rivers-IRMC and the APM-IRMC to ensure compliance with this policy.

Number	Date	Notes	Approved by
		Replaced Risk Management Policy for Power Supply	Board
Original	06/15/2007	Trading Authority Policy w/o matrices	Board
Rev 1	10/16/2009	Name change to Energy Related Transaction Authority Policy with matrices	Board
Rev 2	11/19/2010	MISO Transaction Authority updated	Board
Rev 3	12/17/2010	Updated Solid Fuel Transaction Authority	Board
Rev 4	03/18/2011	Added limestone and lime, general cleanup	Board
Rev 5	02/21/2012	Made revisions to account for retirement of Senior VP Energy Services	Board

**Policy No. 105 –
Appendix A – Energy-Related Transaction Authority Policy**



Your Touchstone Energy Cooperative 

Appendix A to Energy Related Transaction Authority Policy 105

APPROVED BY: CEO CEO Signature <u>Mark E. Bailey</u> Revision 8	APPROVAL DATE: <u>12/18/13</u>
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STAFF AND ACES TRANSACTING AUTHORITY DELEGATIONS

1. Purpose

The purpose of this appendix is to define the authority granted by the Big Rivers CEO ("CEO") to Big Rivers' staff and ACES to execute energy-related transactions.

2. Objective

The objective of this appendix is to extend authority within Policy 105 to Big Rivers' internal staff and ACES.

3. Procedural Requirements

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

Delegation of authority regarding Contract Requirements

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the Chief Operating Officer, the VP Energy Services, the Director of Resources and Forecasting and the Director Power Supply & Market Operations.

4. Bilateral Electric Power and Transmission Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for power and power transmission transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	MW Size	\$/MWH	Total Volume MWH	Total \$	Total Volume MWH	Total \$
Chief Operating Officer	Electric Power and Transmission	> 1 Month ≤ 1 Year	≤ 1 Year	105	\$85	16,200	\$8.1 million	657,000	\$55.8 million
		≤ 1 Month		210	No Max				
VP Energy Services	Electric Power and Transmission	> 1 Month ≤ 6 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	657,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Director of Resources & Forecasting or Director Power Supply & Market Operations	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Senior Power Portfolio Optimization Analyst	Electric Power and Transmission	≤ 1 Week	≤ 1 Month	450	No Max.	10,800	\$6.0 million	200,000	\$25 million
ACES	Electric Power and Transmission	≤ 1 Daily	≤ 1 Week	450	No Max.	10,800	\$5.4 million	100,000	\$12 million

Delegation of authority regarding Firmness of Power

The CEO delegates his authority to sell power that is more firm than the supply source to the Chief Operating Officer.

Delegation of authority regarding Transmission Firmness and Volume

The CEO delegates his authority to execute transmission purchases not of equal firmness and volume to the energy component that such transmission purchase is associated with to the Chief Operating Officer.

Delegation of authority regarding Restricted Delivery Locations

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the Chief Operating Officer.

5. MISO Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for MISO products.

		MISO Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	
Chief Operating Officer	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1750	
	Ancillary Service Awards			425	
	Capacity	≤ 2 Years	≤ 2 Years	425	\$150/MW-day
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
Imports/Exports	No Max				
VP Energy Services or Director of Resources & Forecasting or Director Power Supply & Market Operations	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1700	
	Ancillary Service Awards			425	
	Capacity	≤ 1 Year	≤ 1 Year	425	\$150/MW-day
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	500				
Senior Power Portfolio Optimization Analyst	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1675	
	Ancillary Service Awards			425	
	Financial Transmission Rights	< 6 Months	< 6 Months	425	\$10/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
	Imports/Exports			450	
Energy Services Analyst	Demand Award	As Required by MISO	1 Operating Day	1675	MISO Price Cap
ACES	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1650	
	Ancillary Service Awards			425	
	Financial Transmission Rights	≤ 6 Months	≤ 6 Months	425	\$10/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
	Imports/Exports			400	

6. PJM Transaction Authority (Non-Bilateral)

The following outlines Big Rivers’ staff and ACES transaction limits for PJM products.

		PJM Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
Chief Operating Officer	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	210	\$20
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	No Max	PJM Price Cap
Imports/Exports	No Max				
VP Energy Services or Director of Resources & Forecasting or Director Power Supply & Market Operations	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 3 months	105	\$12
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	500				
Senior Power Portfolio Optimization Analyst	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	450				
ACES	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	400				

7. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	\$/MMBtu	Total Physical Volume MMBtu	Total \$	Total Physical Volume MMBtu	Total \$
Chief Operating Officer	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	20,000	\$300,000	400,000	\$6 million
		≤ 1 Month		No Max	No Max	No Max	No Max		
VP Energy Services	Physical	> 1 Week ≤ 6 Months	≤ 1 Year	20,000	\$15	20,000	\$300,000	200,000	\$3 million
		≤ 1 Week	≤ 1 Month	No Max.	No Max.	No Max	No Max		
Director of Resources & Forecasting or Director Power Supply & Market Operations	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week	≤ 1 Month	No Max.	No Max.	No Max	No Max		
ACES	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	20,000	\$300,000	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000	60,000	\$900,000

***Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

Delegation of authority regarding Gas Firmness

The CEO delegates his authority to sell gas that is more firm than the supply source to the Chief Operating Officer.

Delegation of authority regarding Transportation Firmness and Volume

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the Chief Operating Officer.

8. Fuel Oil Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for fuel oil transactions.

<u>Title</u>	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical-Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$
Chief Operating Officer	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million
		≤ 1 Month		No Max	No Max		
Director of Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million
		≤ 1 Week	≤ 1 Month	No Max	No Max		
ACES	Physical Fuel Oil	As directed	As directed	As directed	As directed	As directed	As directed

9. Solid Fuel Transaction Authority

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
Chief Operating Officer	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director of Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

10. Solid Fuel Transportation Authority

The following outlines Big Rivers' staff transaction limits for solid fuel transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Barge, Rail or Truck Transportation	> 3 Months ≤ 3 Years	≤ 1 Year	2.5 million	\$5	5 million	\$20 million
		≤ 3 Months		No Max	No Max		
Director of Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$5	2 million	\$10 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

11. Emission Allowance Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
VP Energy Services or Director of Resources & Forecasting or Director Power Supply & Market Operations	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million
ACES	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		

12. Limestone Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million
Director of Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million

13. Lime Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for lime reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	162,500	\$120	162,500	\$19.5 million
Director of Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	81,250	\$120	81,250	\$9.75 million

14. Acknowledgements

Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Director of Enterprise Risk Management and Strategic Planning who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, ACES employees are governed by the ACES Power Marketing Trading Sanctions Policy).

Appendix Effective

This Transaction Authority Appendix is in effect upon the CEO's approval and shall remain in effect until a replacement appendix has been approved by the CEO.

Responsibility


It shall be the responsibility of the CEO, Chief Operating Officer and the Big Rivers-IRMC and the ACES-IRMC to ensure compliance with this policy.

Revisions

Big Rivers Policy 105/Appendix A Revision Record			
Number	Date	Notes	Approved by
Rev. 0	11-04-09	Energy Related Trans	Mark Bailey
Rev. 1	11-22-10	MISO and other misc. updates	Mark Bailey
Rev. 2	1-4-11	Updated Solid Fuel Transaction Authority	Mark Bailey
Rev. 3	3-18-11	Added Limestone and Lime, general cleanup	Mark Bailey
Rev. 4	12-5-11	Update Bi-Lateral and Emission limits, add authority for PJM FTRs, add VP of Production	Mark Bailey
Rev. 5	5-7-11	Remove Senior VP Energy Services from document due to retirement/elimination of role	Mark Bailey
Rev. 6	7-12-2012	Change Director of Power Portfolio Optimization to Managing Director Energy Services	Mark Bailey
Rev. 7	2-1-2013	Updated MISO capacity and Natural Gas limits, changed VP Production to Chief Operating Officer, changed Managing Director Energy Services to VP Energy Services, added Manager Power Supply & Market Operations, changed Power Scheduling Analyst to Power Portfolio Optimization Analyst and added Energy Services Analyst	Mark Bailey

Rev. 8	11-4-2013	Updated aggregate limits for VP Energy Services, increased offer price caps for capacity, updated VP Energy Services gas authorization to ensure ability to execute standard TexasGas contracts, changed Power Portfolio Optimization Analyst title to reflect Senior status, replaced Manager Power Supply & Market Operations with Director Power Supply & Market Operations	Mark Bailey
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Your Touchstone Energy® Cooperative 

Appendix A to Energy Related Transaction Authority Policy 105

APPROVED BY: CEO	APPROVAL DATE:
CEO Signature _____	
Revision <u>8</u>	
STAFF AND ACES TRANSACTING AUTHORITY DELEGATIONS	

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1. Purpose

The purpose of this appendix is to define the authority granted by the Big Rivers CEO (“CEO”) to Big Rivers’ staff and ACES to execute energy-related transactions.

2. Objective

The objective of this appendix is to extend authority within Policy 105 to Big Rivers’ internal staff and ACES.

3. Procedural Requirements

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

Delegation of authority regarding Contract Requirements

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the Chief Operating Officer, the VP Energy Services, the Director of Resources and Forecasting and the Director Power Supply & Market Operations.

Deleted: Manager

4. Bilateral Electric Power and Transmission Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for power and power transmission transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	MW Size	\$/MWH	Total Volume MWH	Total \$	Total Volume MWH	Total \$
Chief Operating Officer	Electric Power and Transmission	> 1 Month ≤ 1 Year	≤ 1 Year	105	\$85	16,200	\$8.1 million	657,000	\$55.8 million
		≤ 1 Month		210	No Max				
VP Energy Services	Electric Power and Transmission	> 1 Month ≤ 6 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	657,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
Director of Resources & Forecasting or Director Power Supply & Market Operations	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Senior Power Portfolio Optimization Analyst	Electric Power and Transmission	≤ 1 Week	≤ 1 Month	450	No Max.	10,800	\$6.0 million	200,000	\$25 million
ACES	Electric Power and Transmission	≤ 1 Daily	≤ 1 Week	450	No Max.	10,800	\$5.4 million	100,000	\$12 million

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Deleted: ≤ 1 Month
Deleted: No Max
Deleted: No Max.
Deleted: Manager

Deleted: Power Scheduling Analyst

Delegation of authority regarding Firmness of Power

The CEO delegates his authority to sell power that is more firm than the supply source to the VP Energy Services.

Deleted: Chief Operating Officer

Delegation of authority regarding Transmission Firmness and Volume

The CEO delegates his authority to execute transmission purchases not of equal firmness and volume to the energy component that such transmission purchase is associated with to the Chief Operating Officer.

Delegation of authority regarding Restricted Delivery Locations

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the Chief Operating Officer.

5. MISO Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for MISO products.

MISO Per Transaction Limits (up to)					
Title	Product	Delivery Lead Time	Term	MW Size	
Chief Operating Officer	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1750	
	Ancillary Service Awards	≤ 2 Years	≤ 2 Years	425	\$150/MW-day
	Capacity			425	
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
Imports/Exports	No Max				
VP Energy Services or Director of Resources & Forecasting or Director Power Supply & Market Operations	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1700	
	Ancillary Service Awards	≤ 1 Year	≤ 1 Year	425	\$150/MW Deleted: 45
	Capacity			425	
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap Deleted: Manager
Imports/Exports	500				
Senior Power Portfolio Optimization Analyst	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1675	
	Ancillary Service Awards	< 6 Months	< 6 Months	425	\$10/MWh
	Financial Transmission Rights			425	
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
	Imports/Exports			450	
Energy Services Analyst	Demand Award	As Required by MISO	1 Operating Day	1675	MISO Price Cap
ACES	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1650	
	Ancillary Service Awards	≤ 6 Months	≤ 6 Months	425	\$10/MWh
	Financial Transmission Rights			425	
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
	Imports/Exports			400	

6. PJM Transaction Authority (Non-Bilateral)

The following outlines Big Rivers' staff and ACES transaction limits for PJM products.

		PJM Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
Chief Operating Officer	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 1 Year	≤ 1 Year	210	\$20
	Financial Transmission Rights				
	Virtual Transaction Awards				
VP Energy Services or Director of Resources & Forecasting or Director Power Supply & Market Operations	Imports/Exports	As Required by PJM	1 Operating Day	No Max No Max	PJM Price Cap
	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 1 Year	≤ 3 months	105	\$12
	Financial Transmission Rights				
Virtual Transaction Awards					
Senior Power Portfolio Optimization Analyst	Imports/Exports	As Required by PJM	1 Operating Day	400	Deleted: Manager
	Imports/Exports	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Generation Awards				
	Demand Awards				
	Capacity	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Financial Transmission Rights				
Virtual Transaction Awards					
ACES	Imports/Exports	As Required by PJM	1 Operating Day	400 450	PJM Price Cap
	Imports/Exports	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Generation Awards				
	Demand Awards				
	Capacity	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Financial Transmission Rights				
Virtual Transaction Awards					
ACES	Imports/Exports	As Required by PJM	1 Operating Day	400 400	PJM Price Cap

7. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	S/MMBtu	Total Physical Volume MMBtu	Total \$	Total Physical Volume MMBtu	Total \$
Chief Operating Officer	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	20,000	\$300,000	400,000	\$6 million
		≤ 1 Month		No Max.	No Max.	No Max.	No Max.		
VP Energy Services	Physical	> 1 Week ≤ 6 Months	≤ 1 Year	20,000	\$15	20,000	\$300,000	200,000	Deleted: 3-
		≤ 1 Week		≤ 1 Month	No Max.	No Max.	No Max.		No Max.
Director of Resources & Forecasting or Director Power Supply & Market Operations	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	Deleted: 15
		≤ 1 Week		≤ 1 Month	No Max.	No Max.	No Max.		No Max.
ACES	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	20,000	\$300,000	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000	60,000	\$900,000

***Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

Delegation of authority regarding Gas Firmness

The CEO delegates his authority to sell gas that is more firm than the supply source to the Chief Operating Officer.

Delegation of authority regarding Transportation Firmness and Volume

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the Chief Operating Officer.

8. Fuel Oil Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for fuel oil transactions.

<u>Title</u>	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical-Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$
Chief Operating Officer	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million
		≤ 1 Month		No Max	No Max		
Director of Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million
		≤ 1 Week	≤ 1 Month	No Max	No Max		
ACES	Physical Fuel Oil	As directed	As directed	As directed	As directed	As directed	As directed

9. Solid Fuel Transaction Authority

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
Chief Operating Officer	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director of Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

10. Solid Fuel Transportation Authority

The following outlines Big Rivers' staff transaction limits for solid fuel transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Barge, Rail or Truck Transportation	> 3 Months ≤ 3 Years	≤ 1 Year	2.5 million	\$5	5 million	\$20 million
		≤ 3 Months		No Max	No Max		
Director of Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$5	2 million	\$10 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

11. Emission Allowance Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
VP Energy Services or Director of Resources & Forecasting or Director of Power Supply & Market Operations	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million
ACES	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		

Deleted: Manager

12. Limestone Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million
Director of Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million

13. Lime Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for lime reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Chief Operating Officer	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	162,500	\$120	162,500	\$19.5 million
Director of Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	81,250	\$120	81,250	\$9.75 million

14. Acknowledgements

Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Director of Enterprise Risk Management and Strategic Planning who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, ACES employees are governed by the ACES Power Marketing Trading Sanctions Policy).

Appendix Effective

This Transaction Authority Appendix is in effect upon the CEO's approval and shall remain in effect until a replacement appendix has been approved by the CEO.

Responsibility

It shall be the responsibility of the CEO, Chief Operating Officer and the Big Rivers-IRMC and the ACES-IRMC to ensure compliance with this policy.

Revisions

Big Rivers Policy 105/Appendix A Revision Record			
Number	Date	Notes	Approved by
Rev. 0	11-04-09	Energy Related Trans	Mark Bailey
Rev. 1	11-22-10	MISO and other misc. updates	Mark Bailey
Rev. 2	1-4-11	Updated Solid Fuel Transaction Authority	Mark Bailey
Rev. 3	3-18-11	Added Limestone and Lime, general cleanup	Mark Bailey
Rev. 4	12-5-11	Update Bi-Lateral and Emission limits, add authority for PJM FTRs, add VP of Production	Mark Bailey
Rev. 5	5-7-11	Remove Senior VP Energy Services from document due to retirement/elimination of role	Mark Bailey
Rev. 6	7-12-2012	Change Director of Power Portfolio Optimization to Managing Director Energy Services	Mark Bailey
Rev. 7	2-1-2013	Updated MISO capacity and Natural Gas limits, changed VP Production to Chief Operating Officer, changed Managing Director Energy Services to VP Energy Services, added Manager Power Supply & Market Operations, changed Power Scheduling Analyst to Power Portfolio Optimization Analyst and added Energy Services Analyst	Mark Bailey

Rev. 8	11-4-2013	Updated aggregate limits for VP Energy Services, increased offer price caps for capacity, updated VP Energy Services gas authorization to ensure ability to execute standard Texas Gas contracts, changed Power Portfolio Optimization Analyst title to reflect Senior status, replaced Manager Power Supply & Market Operations with Director Power Supply & Market Operations	Mark Bailey
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**Policy No. 120 –
Fuel Procurement Policy and Procedure**





Policy Number 120

Original Effective Date	<u>07/16/2009</u>	Approved by: Board
Original Approval Date	<u>12/21/2007</u>	
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Fuel Procurement Policies and Procedures

Policy Purpose

The purpose of the Fuel Procurement Policies and Procedures guidelines is to present the principles that govern the procurement of fuel, reagent, and associated transportation. This document is not intended to provide a step-by-step procedural flow, but place an emphasis on procurement policies and a concise overview of appropriate procurement practices. The awarding of Contracts and Purchase Orders will comply with business controls including corporate governance, authority limit matrices, auditing recommendations, and other established practices and limitations.

FUEL PROCUREMENT POLICIES AND PROCEDURES

A. Definitions:

1. "Agreement" means a legally binding document, in which one party agrees to sell and the other agrees to buy fuel, reagent, or transportation services for such, which is executed by both Buyer and Seller.
2. "Award Recommendation" means the Company's approval process for the review and approval by Senior Management of a recommended fuel, reagent, or transportation purchase that fall outside the limits established in the Company's granted authority limits.
3. "Company" means Big Rivers Electric Corporation.
4. "Contract" is an Agreement, Letter Agreement, Purchase Order, or Spot Contract for fuel supply, reagent, or such transportation with certain terms and conditions that describe the business transaction under which the Company procures fuel, reagent, and related transportation.
5. "Contract purchase" means any purchase of fuel, reagent, or transportation on behalf of the Company under a contract, typically more than one year's duration.
6. "Department" means the Company's Fuels Department.
7. "Director" means the Company's Director of Fuels.
8. "Emergency" means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments and other problems affecting the production or transportation of fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that could be reasonably foreseen as impairing the continued supply of fuel to Company facilities.
9. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Company's generating units.
10. "Fuel" means combustibles purchased by the Company for one or more of its generating stations.



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11. "Chief Operating Officer" means the Company's principal individual responsible for power generation and fuel procurement, among other duties.
12. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
13. "Spot Contract" is a type of agreement that may be issued by the Company for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
14. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of the Company where the terms and conditions are incorporated in the Letter Agreement, Purchase Order or Spot Contract and the term is typically of one year or less.
15. "Station" means one of the Company's generating facilities.
16. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
17. "Unit" means a generating unit at a station.
18. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

B. Fuel Procurement Policies:

The Company's fuel procurement policy is to obtain an adequate supply of fuel and reagent of sufficient quality at the most competitive overall evaluated cost on a unit bus bar basis consistent with the Company's obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. The Company will use its best efforts to secure its fuel and reagent supply at competitive prices through solicitation for such.

Implementation of this policy is of highest priority to the Company. The Fuels Department shall be organized and staffed, and fuel procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with this policy. Fuel, reagent, and related transportation shall be purchased at competitive prices considering all material factors. The factors include but are not limited to: quantity needed to maintain an adequate supply, quality necessary to ensure generating unit operating and maintenance characteristics and environmental standards, reliability of the supplier, creditworthiness, and forward planning to meet projected system requirements, and meeting emergency or other unusual circumstances that might affect operating conditions. From time to time, the Director of Fuels will review the Company's Fuel Procurement Policies and Procedures and recommend updates as appropriate.

C. Organization:



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1. Department Structure. The Department shall be organized and staffed to effectively administer the Company's fuel procurement function.
2. Organizational Responsibility. The Chief Operating Officer to whom the Director reports, has the responsibility for fuel procurement. The Director is responsible for the Department. Other departments may be called upon by the Department to the extent the Director or Chief Operating Officer considers advisable in the execution of the functions of the Department.
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Director of Fuels which is specified in the single transaction authority limits by the Company. The Award Recommendation will be drafted by the Director, reviewed by Fuels legal counsel, and executed by the Chief Operating Officer within the authority granted by the Energy Related Transaction Authority Policy. Greater expenditures shall require the signature of the Company's President and Chief Executive Officer and within his trading authority as established by the Board of Directors. These levels of authority may be amended, supplemented, or superseded as dictated by the Company.
4. Reports. The Director will instruct the Department to prepare, maintain and distribute reports to management and others as deemed necessary for business operations and regulatory requirements.
5. Records. The Department shall maintain the following records:
 - a. Open Contract Files. The Department shall maintain the following on open status for at least one-year or longer as the contract term or other conditions warrant:
 1. For each current contract supplier, the files will contain:
 - a) Contract documents, amendments, purchase orders and escalation documentation;
 - b) General correspondence;
 - c) Invoices and invoice verification data;
 - d) Delivery records and quality analyses data;
 - e) Inspection reports and other data.
 2. A record of transportation equipment owned or leased by the Company (as applicable).
 3. A list containing current suppliers and known potential Suppliers of fuel.
 - b. Closed Contract Files. The Department shall maintain its files according to the Company's record retention plan.
6. General Administrative Duties.



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The Department shall subscribe to and have membership in appropriate trade and industry publications and/or associations, to include reports of governmental or consulting agencies concerning fuel, reagent, and related transportation market information, to include fuel prices and/or projections. Department personnel shall use their best efforts to keep current with fuel market conditions, prices and availability, and other developments relating to fuel procurement.

D. Fuel Supply Procedures:

1. Projections. In conjunction with other departments of the Company, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in the Company's planning process.
2. Contract/Spot Mix. Subject to the approval of the Chief Operating Officer, the Director shall determine whether a contract purchase is advisable, considering the following factors: (a) the availability of adequate supplies from qualified suppliers, (b) the advisability or need to have an adequate supply committed for an existing or planned unit (subject to inventory limits specified by the Company), (c) the desire to maintain practical flexibility as to market conditions and other factors affecting price and availability, (d) existing and anticipated environmental standards, (e) such other factors as may reasonably affect the implementation of the Company's Fuel Procurement Policy and (f) fuel impact on generation facilities' operation and maintenance.
3. Current Requirements. The Department shall review and analyze the data available to the Department for purposes of conducting fuel and reagent purchases in a timely manner to meet the requirements of the Company.
4. Supplier Qualifications. The Company shall select potential suppliers on the basis of evaluation, market intelligence, performance information (as available), industry research, and creditworthiness, as determined by the Director and his staff. No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

A supplier evaluation (to include site visit and mine engineering and/or performance report) may be performed to determine if a supplier has the ability to deliver in the time frame requested the quantity and quality of coal or reagent bid at the offered price.

5. Solicitations. The Department shall maintain a current list of Suppliers and shall review that list from time to time to ensure that it remains current. Normally, the Company shall purchase its fuel and reagent through sealed bid solicitations; however, the Company reserves the right to utilize its market intelligence to seize opportunity purchases of fuels and reagent, request oral, written, or electronic offers, potentially followed by negotiations, when in its judgment market conditions provide an opportunity to obtain fuel or reagent more advantageously than through mailed bid solicitations and usual procedures. When the Company foregoes the solicitation process, documentation shall be appended to the resulting purchase order file describing the conditions.



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A notice of a request for quotation (“RFQ”) shall be provided to normal industry newsletters and information postings. The normal solicitation process shall require that potential suppliers be notified in writing as to the general quantities, terms and quality specifications required. An RFQ number will be assigned to for the quotation package. An RFQ will include: instructions to bidders (date and time due); scope of supply (quantity and quality); potential term; standard terms and conditions of typical agreements.

Offers from potential suppliers shall be returned by the requested date and time or they will be rejected. A bid log shall be kept for logging in receipt of bid offers. Attendees viewing the opening of the bid shall initial the bid document as opened and the log as at the completion of the opening. Offers shall be opened and logged in the presence of the Chief Operating Officer and Director of Fuel or their representative in their absence, and another selected representative outside of the Fuels Department.

All appropriate bid data shall be documented and electronically categorized for the process of evaluation of the various offerings of fuel and reagent. The documents shall be maintained in a secured area and shall be kept pursuant to normal record keeping practices.

- 6. Contract Awards. The Department shall review and analyze each Contract offer. The Director, or his/her representative, may engage in preliminary negotiations to determine which offers warrant further consideration. The Director and/or representative shall investigate the potential supplier and proposed source of supply; and, as to any offer for fuel, the Department shall verify the adequacy of the proposed source of supply as to quantity, quality, and timely deliverability.

The evaluation shall include, but not necessarily be limited to, the response to the RFQ (items required by the RFQ for satisfactory operational, environmental, and economic criteria); diversity of supply; supplier credit assessment; transportation mode and cost; and diversity of suppliers to provide the lowest evaluated cost of electrical energy to the Unit bus bar over the long term.

From this initial evaluation, a select group of potential suppliers (a “short-list”) of suppliers shall be developed for more in-depth evaluation. The Department may then engage in preliminary discussions to ensure that the offer warrants further evaluation and consideration. The objective of the negotiating discussions is to ensure that the Company achieves balanced terms and conditions and the lowest evaluated electrical energy delivered to the Unit bus bar and reliable supply consistent with other qualifiers related to supplier reliability, environmental restraints, transportation options, etc.

The recommended Supplier(s) shall be selected by the negotiating team based upon the evaluation criteria and the results of the negotiating discussions. The Department shall prepare a detailed Award Recommendation for approval. The Award Recommendation shall document the selection criteria and pertinent factors, and in circumstances where more than one company is selected, the recommendation shall describe the tonnage requirements and other responsibilities of each of the other recommended Suppliers.



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All contracts for which the term, tenor or notional amount exceed the limits specified for the Director of Fuels must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy.

7. Spot Purchases. Spot purchases may be made by the Company whenever considered advisable by the Director in furtherance of the Company's fuel and reagent needs, subject to the limit of authority as outlined by the Company.
 8. Documentation. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of the Company. A purchase order may be issued for a spot purchase. A purchase order shall contain all terms of that purchase. Further, the Department shall maintain documentation of the final list (log) of bidders, a copy of the entire bid package; bidder's responses; and the bid evaluation summary used for decision support.
 9. Fuel Oil. Fuel Supply Procedures principally address procurement of solid fuel. Fuel oil is procured on an "as-needed" basis due to the infrequency of use of this fuel and the nature of the oil markets. When the need for oil arises, the Fuels Department shall act to solicit vendors for offers. Orders are assigned on the basis of lowest delivered cost per gallon and ability to fill the order. Solicitation results shall be documented and purchase orders issued in the Fuels Department for those purchases initiated and completed by the Department.
- E. Fuel Supply and Reagent Agreement Administration:**
1. Compliance. The Department shall review and analyze daily business and operational reports to properly administer all fuel and transportation agreements.
 2. Coal weights. Coal weights shall be obtained by either the Company or by Supplier, upon agreement by Company. Coal weight is obtained by scale or draft method, depending upon Company site or methodology employed by Supplier to ascertain weights. In either event, coal weights are obtained by industry-accepted standards, and in cases where scales are utilized, are duly tested and maintained in proper order for such purpose. In cases where draft weights are utilized, the Company employs processes to verify actions to obtain draft weights and that such measures are by industry-accepted standards. Coal quantity is obtained by Station personnel and reported through the fuels information system or is provided by the Supplier pursuant to the contract agreement.
 3. Coal sampling. Coal sampling and analysis shall be performed by either the Company or the Supplier, upon agreement by Company. Coal sampling and analysis shall be performed according to procedures adopted by the Company's laboratory in accordance with A.S.T.M. standards for coal sampling, coal sample preparation, coal sample identification, handling of sample, and coal analysis. Coal quality is assessed and reported through the fuels information system by the Company's laboratory personnel or is provided by the Supplier pursuant to the contract agreement.
 4. Amendments. A contract shall not be materially amended except after analysis by the Department and recommendation of the Director of Fuels or the Chief Operating Officer. No material contract



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or purchase order addendum shall be made except upon recommendation of the Director and subject to the approval limits of the Company.

5. Contract Administration. The Director and the Department shall remain informed as to the terms and conditions of each current contract, and maintain the necessary data to administer the contracts. Every supplier request for a change in terms, conditions, or prices must be written and supported by adequate data in conformity with the contract. Each such request shall be analyzed by the Department against the contract provisions, and reported with recommendations to the Director. After review by the Director, the supplier request and Department's recommendations shall be approved as required by the Company. If any request is not approved in whole or in part, the Director shall advise the supplier, specifying the Company's objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Company as dictated by contract terms shall be the primary method of resolving the issue.
6. Force Majeure. A supplier's claim for relief from compliance with fuel supply agreement terms due to force majeure conditions must be in writing with an adequate description of conditions warranting nonperformance. Each force majeure claim shall be reviewed by the Director and the company's legal counsel.
7. Inspections. The Director shall request inspections of mining and other facilities of a contract fuel and/or reagent supplier or other facilities as required or deemed necessary to manage the performance and contractual relationship (Contract Administration).

F. Fuel and Reagent Supply Agreement Enforcement:

1. General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by the Company in a reasonable, fair, and practical manner to achieve supplier compliance with the Company's overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
2. Director Responsibility. Whenever it is determined that a shipment does not meet Fuel Supply or Reagent Agreement terms, the Director, or his/her designee, shall inform the supplier and direct that subsequent shipments be in compliance. When necessary the Chief Operating Officer and the Director may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
3. Legal Assistance. The Department shall have access to, and shall receive advice from, legal counsel as provided by the Company on any matter relating to fuel, reagent, and related transportation procurement, contracts and amendments thereto, administration, and enforcement. Should a dispute as to a supplier's performance fail to be satisfactorily resolved by the Director, the matter shall be referred to legal counsel. Legal counsel may consider further negotiation, arbitration (if provided by the contract), or litigation. No arbitration or litigation shall commence except on the advice of said counsel with approval by senior management.

G. Inventory Levels:



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The Company has an obligation to ensure continuous low cost, reliable service to its members. Decisions affecting fuel inventory shall consider these obligations.

The Company shall maintain an adequate inventory while allowing for enough flexibility to permit inventory levels to be responsive to known and anticipated changes in conditions in an attempt to avoid risks and stoppages due to unforeseen conditions. Inventory shall be recommended based upon, but not limited to, supplier performance, environmental conditions, labor matters, logistical issues and concerns, and generation requirements and dispatch. The general level of inventory shall be monitored for such matters and recommendations to adjust inventory to meet anticipated conditions shall be made from time to time. Such inventory recommendations shall be made by the Director for approval by the Senior Management of the Company.

Coal inventories and reagent shall be monitored and reported regularly via the Company's fuel information system(s).

H. Emergency Procurement:

Any one or more of the procedures described herein may be waived by the Chief Operating Officer, when, in the informed judgment of the Director, and on his recommendation, fuel must be purchased without complying with one or more of such provisions due to extraordinary conditions including strikes, lockouts or other labor problems affecting fuel production, embargoes, mining or other problems affecting production or transportation, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of fuel and reagent to the Company from its existing suppliers. When such a purchase is made, documentation of circumstances will be appended to the purchase order and/or contract file.

I. Transportation Services Contracts:

Transportation services bids shall be requested and Contracts negotiated whenever appropriate. Consideration shall be given to plant requirements, supplier loading capabilities, relative location of supplier to Stations, transportation mix, unloading capabilities and capacities at Stations, logistic constraints, transportation provider economics, Station material handling economics, and any other factor which might affect the delivery of Fuel and reagent to the Company's Stations.

Unless otherwise dictated by Emergency situations, the Solicitation process will be utilized for transportation services. The selection of transportation provider will generally be based upon, but not necessarily limited to cost, reliability, insurance, past / current performance, container availability and suitability for purpose, material handling capacities and constraints, transportation mix, and any other mitigating factors in terms of logistics.

All transportation service agreements shall be in written contractual form duly executed by an authorized supplier of service and the Company.

J. Ethics and Conduct:



BOARD POLICY

Fuel Procurement Policies and Procedures

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The Company recognizes the importance of following appropriate business ethics to guide the conduct of the Fuels Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of the Company including, but not limited to, the Business Ethics Policy and the Conflicts of Interest Policy for Big Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.

Fuels staff shall endeavor to serve the best interests of the Company, its Members, and stakeholders in the performance of their duties and responsibilities.

Number	Date	Notes	Approved by
Original	12/21/2007	Approved to be effective at close of unwind	Board
Rev. 1	03/16/2012	Update out of date language and staffing changes	Board
Rev. 2	03/14/2013	Update due to title change	
Rev. 3	02/20/2014	Add date last reviewed line, section header and change "mmBTU" to "gallon"	Board



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Fuel Procurement Policies and Procedures

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2. "Award Recommendation" means the Company's approval process for the review and approval by Senior Management of a recommended fuel, reagent, or transportation purchase that fall outside the limits established in the Company's granted authority limits.
3. "Company" means Big Rivers Electric Corporation.
4. "Contract" is an Agreement, Letter Agreement, Purchase Order, or Spot Contract for fuel supply, reagent, or such transportation with certain terms and conditions that describe the business transaction under which the Company procures fuel, reagent, and related transportation.
5. "Contract purchase" means any purchase of fuel, reagent, or transportation on behalf of the Company under a contract, typically more than one year's duration.
6. "Department" means the Company's Fuels Department.
7. "Director" means the Company's Director of Fuels.
8. "Emergency" means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments and other problems affecting the production or transportation of fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that could be reasonably foreseen as impairing the continued supply of fuel to Company facilities.
9. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Company's generating units.
10. "Fuel" means combustibles purchased by the Company for one or more of its generating stations.



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Fuel Procurement Policies and Procedures

11. "Chief Operating Officer" means the Company's principal individual responsible for power generation and fuel procurement, among other duties.
12. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
13. "Spot Contract" is a type of agreement that may be issued by the Company for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
14. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of the Company where the terms and conditions are incorporated in the Letter Agreement, Purchase Order or Spot Contract and the term is typically of one year or less.
15. "Station" means one of the Company's generating facilities.
16. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
17. "Unit" means a generating unit at a station.
18. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

B. Fuel Procurement Policies:

The Company's fuel procurement policy is to obtain an adequate supply of fuel and reagent of sufficient quality at the most competitive overall evaluated cost on a unit bus bar basis consistent with the Company's obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. The Company will use its best efforts to secure its fuel and reagent supply at competitive prices through solicitation for such.

Implementation of this policy is of highest priority to the Company. The Fuels Department shall be organized and staffed, and fuel procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with this policy. Fuel, reagent, and related transportation shall be purchased at competitive prices considering all material factors. The factors include but are not limited to: quantity needed to maintain an adequate supply, quality necessary to ensure generating unit operating and maintenance characteristics and environmental standards, reliability of the supplier, creditworthiness, and forward planning to meet projected system requirements, and meeting emergency or other unusual circumstances that might affect operating conditions. From time to time, the Director of Fuels will review the Company's Fuel Procurement Policies and Procedures and recommend updates as appropriate.

C. Organization:



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Fuel Procurement Policies and Procedures

1. Department Structure. The Department shall be organized and staffed to effectively administer the Company's fuel procurement function.
2. Organizational Responsibility. The Chief Operating Officer to whom the Director reports, has the responsibility for fuel procurement. The Director is responsible for the Department. Other departments may be called upon by the Department to the extent the Director or Chief Operating Officer considers advisable in the execution of the functions of the Department.
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Director of Fuels which is specified in the single transaction authority limits by the Company. The Award Recommendation will be drafted by the Director, reviewed by Fuels legal counsel, and executed by the Chief Operating Officer within the authority granted by the Energy Related Transaction Authority Policy. Greater expenditures shall require the signature of the Company's President and Chief Executive Officer and within his trading authority as established by the Board of Directors. These levels of authority may be amended, supplemented, or superseded as dictated by the Company.
4. Reports. The Director will instruct the Department to prepare, maintain and distribute reports to management and others as deemed necessary for business operations and regulatory requirements.
5. Records. The Department shall maintain the following records:
 - a. Open Contract Files. The Department shall maintain the following on open status for at least one-year or longer as the contract term or other conditions warrant:
 1. For each current contract supplier, the files will contain:
 - a) Contract documents, amendments, purchase orders and escalation documentation;
 - b) General correspondence;
 - c) Invoices and invoice verification data;
 - d) Delivery records and quality analyses data;
 - e) Inspection reports and other data.
 2. A record of transportation equipment owned or leased by the Company (as applicable).
 3. A list containing current suppliers and known potential Suppliers of fuel.
 - b. Closed Contract Files. The Department shall maintain its files according to the Company's record retention plan.
6. General Administrative Duties.



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Fuel Procurement Policies and Procedures

The Department shall subscribe to and have membership in appropriate trade and industry publications and/or associations, to include reports of governmental or consulting agencies concerning fuel, reagent, and related transportation market information, to include fuel prices and/or projections. Department personnel shall use their best efforts to keep current with fuel market conditions, prices and availability, and other developments relating to fuel procurement.

D. Fuel Supply Procedures:

1. Projections. In conjunction with other departments of the Company, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in the Company's planning process.
2. Contract/Spot Mix. Subject to the approval of the Chief Operating Officer, the Director shall determine whether a contract purchase is advisable, considering the following factors: (a) the availability of adequate supplies from qualified suppliers, (b) the advisability or need to have an adequate supply committed for an existing or planned unit (subject to inventory limits specified by the Company), (c) the desire to maintain practical flexibility as to market conditions and other factors affecting price and availability, (d) existing and anticipated environmental standards, (e) such other factors as may reasonably affect the implementation of the Company's Fuel Procurement Policy and (f) fuel impact on generation facilities' operation and maintenance.
3. Current Requirements. The Department shall review and analyze the data available to the Department for purposes of conducting fuel and reagent purchases in a timely manner to meet the requirements of the Company.
4. Supplier Qualifications. The Company shall select potential suppliers on the basis of evaluation, market intelligence, performance information (as available), industry research, and creditworthiness, as determined by the Director and his staff. No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

A supplier evaluation (to include site visit and mine engineering and/or performance report) may be performed to determine if a supplier has the ability to deliver in the time frame requested the quantity and quality of coal or reagent bid at the offered price.

5. Solicitations. The Department shall maintain a current list of Suppliers and shall review that list from time to time to ensure that it remains current. Normally, the Company shall purchase its fuel and reagent through sealed bid solicitations; however, the Company reserves the right to utilize its market intelligence to seize opportunity purchases of fuels and reagent, request oral, written, or electronic offers, potentially followed by negotiations, when in its judgment market conditions provide an opportunity to obtain fuel or reagent more advantageously than through mailed bid solicitations and usual procedures. When the Company foregoes the solicitation process, documentation shall be appended to the resulting purchase order file describing the conditions.



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Fuel Procurement Policies and Procedures

A notice of a request for quotation (“RFQ”) shall be provided to normal industry newsletters and information postings. The normal solicitation process shall require that potential suppliers be notified in writing as to the general quantities, terms and quality specifications required. An RFQ number will be assigned to for the quotation package. An RFQ will include: instructions to bidders (date and time due); scope of supply (quantity and quality); potential term; standard terms and conditions of typical agreements.

Offers from potential suppliers shall be returned by the requested date and time or they will be rejected. A bid log shall be kept for logging in receipt of bid offers. Attendees viewing the opening of the bid shall initial the bid document as opened and the log as at the completion of the opening. Offers shall be opened and logged in the presence of the Chief Operating Officer and Director of Fuel or their representative in their absence, and another selected representative outside of the Fuels Department.

All appropriate bid data shall be documented and electronically categorized for the process of evaluation of the various offerings of fuel and reagent. The documents shall be maintained in a secured area and shall be kept pursuant to normal record keeping practices.

- 6. Contract Awards. The Department shall review and analyze each Contract offer. The Director, or his/her representative, may engage in preliminary negotiations to determine which offers warrant further consideration. The Director and/or representative shall investigate the potential supplier and proposed source of supply; and, as to any offer for fuel, the Department shall verify the adequacy of the proposed source of supply as to quantity, quality, and timely deliverability.

The evaluation shall include, but not necessarily be limited to, the response to the RFQ (items required by the RFQ for satisfactory operational, environmental, and economic criteria); diversity of supply; supplier credit assessment; transportation mode and cost; and diversity of suppliers to provide the lowest evaluated cost of electrical energy to the Unit bus bar over the long term.

From this initial evaluation, a select group of potential suppliers (a “short-list”) of suppliers shall be developed for more in-depth evaluation. The Department may then engage in preliminary discussions to ensure that the offer warrants further evaluation and consideration. The objective of the negotiating discussions is to ensure that the Company achieves balanced terms and conditions and the lowest evaluated electrical energy delivered to the Unit bus bar and reliable supply consistent with other qualifiers related to supplier reliability, environmental restraints, transportation options, etc.

The recommended Supplier(s) shall be selected by the negotiating team based upon the evaluation criteria and the results of the negotiating discussions. The Department shall prepare a detailed Award Recommendation for approval. The Award Recommendation shall document the selection criteria and pertinent factors, and in circumstances where more than one company is selected, the recommendation shall describe the tonnage requirements and other responsibilities of each of the other recommended Suppliers.



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All contracts for which the term, tenor or notional amount exceed the limits specified for the Director of Fuels must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy.

7. Spot Purchases. Spot purchases may be made by the Company whenever considered advisable by the Director in furtherance of the Company's fuel and reagent needs, subject to the limit of authority as outlined by the Company.
 8. Documentation. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of the Company. A purchase order may be issued for a spot purchase. A purchase order shall contain all terms of that purchase. Further, the Department shall maintain documentation of the final list (log) of bidders, a copy of the entire bid package; bidder's responses; and the bid evaluation summary used for decision support.
 9. Fuel Oil. Fuel Supply Procedures principally address procurement of solid fuel. Fuel oil is procured on an "as-needed" basis due to the infrequency of use of this fuel and the nature of the oil markets. When the need for oil arises, the Fuels Department shall act to solicit vendors for offers. Orders are assigned on the basis of lowest delivered cost per gallon and ability to fill the order. Solicitation results shall be documented and purchase orders issued in the Fuels Department for those purchases initiated and completed by the Department.
- E. Fuel Supply and Reagent Agreement Administration:**
1. Compliance. The Department shall review and analyze daily business and operational reports to properly administer all fuel and transportation agreements.
 2. Coal weights. Coal weights shall be obtained by either the Company or by Supplier, upon agreement by Company. Coal weight is obtained by scale or draft method, depending upon Company site or methodology employed by Supplier to ascertain weights. In either event, coal weights are obtained by industry-accepted standards, and in cases where scales are utilized, are duly tested and maintained in proper order for such purpose. In cases where draft weights are utilized, the Company employs processes to verify actions to obtain draft weights and that such measures are by industry-accepted standards. Coal quantity is obtained by Station personnel and reported through the fuels information system or is provided by the Supplier pursuant to the contract agreement.
 3. Coal sampling. Coal sampling and analysis shall be performed by either the Company or the Supplier, upon agreement by Company. Coal sampling and analysis shall be performed according to procedures adopted by the Company's laboratory in accordance with A.S.T.M. standards for coal sampling, coal sample preparation, coal sample identification, handling of sample, and coal analysis. Coal quality is assessed and reported through the fuels information system by the Company's laboratory personnel or is provided by the Supplier pursuant to the contract agreement.
 4. Amendments. A contract shall not be materially amended except after analysis by the Department and recommendation of the Director of Fuels or the Chief Operating Officer. No material contract



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or purchase order addendum shall be made except upon recommendation of the Director and subject to the approval limits of the Company.

5. Contract Administration. The Director and the Department shall remain informed as to the terms and conditions of each current contract, and maintain the necessary data to administer the contracts. Every supplier request for a change in terms, conditions, or prices must be written and supported by adequate data in conformity with the contract. Each such request shall be analyzed by the Department against the contract provisions, and reported with recommendations to the Director. After review by the Director, the supplier request and Department's recommendations shall be approved as required by the Company. If any request is not approved in whole or in part, the Director shall advise the supplier, specifying the Company's objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Company as dictated by contract terms shall be the primary method of resolving the issue.
 6. Force Majeure. A supplier's claim for relief from compliance with fuel supply agreement terms due to force majeure conditions must be in writing with an adequate description of conditions warranting nonperformance. Each force majeure claim shall be reviewed by the Director and the company's legal counsel.
 7. Inspections. The Director shall request inspections of mining and other facilities of a contract fuel and/or reagent supplier or other facilities as required or deemed necessary to manage the performance and contractual relationship (Contract Administration).
- F. Fuel and Reagent Supply Agreement Enforcement:**
1. General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by the Company in a reasonable, fair, and practical manner to achieve supplier compliance with the Company's overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
 2. Director Responsibility. Whenever it is determined that a shipment does not meet Fuel Supply or Reagent Agreement terms, the Director, or his/her designee, shall inform the supplier and direct that subsequent shipments be in compliance. When necessary the Chief Operating Officer and the Director may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
 3. Legal Assistance. The Department shall have access to, and shall receive advice from, legal counsel as provided by the Company on any matter relating to fuel, reagent, and related transportation procurement, contracts and amendments thereto, administration, and enforcement. Should a dispute as to a supplier's performance fail to be satisfactorily resolved by the Director, the matter shall be referred to legal counsel. Legal counsel may consider further negotiation, arbitration (if provided by the contract), or litigation. No arbitration or litigation shall commence except on the advice of said counsel with approval by senior management.
- G. Inventory Levels:**



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The Company has an obligation to ensure continuous low cost, reliable service to its members. Decisions affecting fuel inventory shall consider these obligations.

The Company shall maintain an adequate inventory while allowing for enough flexibility to permit inventory levels to be responsive to known and anticipated changes in conditions in an attempt to avoid risks and stoppages due to unforeseen conditions. Inventory shall be recommended based upon, but not limited to, supplier performance, environmental conditions, labor matters, logistical issues and concerns, and generation requirements and dispatch. The general level of inventory shall be monitored for such matters and recommendations to adjust inventory to meet anticipated conditions shall be made from time to time. Such inventory recommendations shall be made by the Director for approval by the Senior Management of the Company.

Coal inventories and reagent shall be monitored and reported regularly via the Company's fuel information system(s).

H. Emergency Procurement:

Any one or more of the procedures described herein may be waived by the Chief Operating Officer, when, in the informed judgment of the Director, and on his recommendation, fuel must be purchased without complying with one or more of such provisions due to extraordinary conditions including strikes, lockouts or other labor problems affecting fuel production, embargoes, mining or other problems affecting production or transportation, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of fuel and reagent to the Company from its existing suppliers. When such a purchase is made, documentation of circumstances will be appended to the purchase order and/or contract file.

I. Transportation Services Contracts:

Transportation services bids shall be requested and Contracts negotiated whenever appropriate. Consideration shall be given to plant requirements, supplier loading capabilities, relative location of supplier to Stations, transportation mix, unloading capabilities and capacities at Stations, logistic constraints, transportation provider economics, Station material handling economics, and any other factor which might affect the delivery of Fuel and reagent to the Company's Stations.

Unless otherwise dictated by Emergency situations, the Solicitation process will be utilized for transportation services. The selection of transportation provider will generally be based upon, but not necessarily limited to cost, reliability, insurance, past / current performance, container availability and suitability for purpose, material handling capacities and constraints, transportation mix, and any other mitigating factors in terms of logistics.

All transportation service agreements shall be in written contractual form duly executed by an authorized supplier of service and the Company.

J. Ethics and Conduct:



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The Company recognizes the importance of following appropriate business ethics to guide the conduct of the Fuels Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of the Company including, but not limited to, the Business Ethics Policy and the Conflicts of Interest Policy for Big Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.

Fuels staff shall endeavor to serve the best interests of the Company, its Members, and stakeholders in the performance of their duties and responsibilities.

Number	Date	Notes	Approved by
Original	12/21/2007	Approved to be effective at close of unwind	Board
Rev. 1	03/16/2012	Update out of date language and staffing changes	Board
Rev. 2	03/14/2013	Update due to title change	
Rev. 3	02/20/2014	Add date last reviewed line, section header and change "mmBTU" to "gallon"	Board



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Policy Purpose

The purpose of the Fuel Procurement Policies and Procedures guidelines is to present the principles that govern the procurement of fuel, reagent, and associated transportation. This document is not intended to provide a step-by-step procedural flow, but place an emphasis on procurement policies and a concise overview of appropriate procurement practices. The awarding of Contracts and Purchase Orders will comply with business controls including corporate governance, authority limit matrices, auditing recommendations, and other established practices and limitations.

FUEL PROCUREMENT POLICIES AND PROCEDURES

A. Definitions:

1. "Agreement" means a legally binding document, in which one party agrees to sell and the other agrees to buy fuel, reagent, or transportation services for such, which is executed by both Buyer and Seller.
2. "Award Recommendation" means the Company's approval process for the review and approval by Senior Management of a recommended fuel, reagent, or transportation purchase that fall outside the limits established in the Company's granted authority limits.
3. "Company" means Big Rivers Electric Corporation.
4. "Contract" is an Agreement, Letter Agreement, Purchase Order, or Spot Contract for fuel supply, reagent, or such transportation with certain terms and conditions that describe the business transaction under which the Company procures fuel, reagent, and related transportation.
5. "Contract purchase" means any purchase of fuel, reagent, or transportation on behalf of the Company under a contract, typically more than one year's duration.
6. "Department" means the Company's Fuels Department.
7. "Director" means the Company's Director of Fuels.
8. "Emergency" means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments and other problems affecting the production or transportation of fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that could be reasonably foreseen as impairing the continued supply of fuel to Company facilities.
9. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Company's generating units.
10. "Fuel" means combustibles purchased by the Company for one or more of its generating stations.



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Fuel Procurement Policies and Procedures

- 11. Chief Operating Officer means the Company's principal individual responsible for power generation and fuel procurement, among other duties. Deleted: "VP Production"
- 12. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
- 13. "Spot Contract" is a type of agreement that may be issued by the Company for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
- 14. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of the Company where the terms and conditions are incorporated in the Letter Agreement, Purchase Order or Spot Contract and the term is typically of one year or less.
- 15. "Station" means one of the Company's generating facilities.
- 16. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
- 17. "Unit" means a generating unit at a station.
- 18. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

B. Fuel Procurement Policies:

The Company's fuel procurement policy is to obtain an adequate supply of fuel and reagent of sufficient quality at the most competitive overall evaluated cost on a unit bus bar basis consistent with the Company's obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. The Company will use its best efforts to secure its fuel and reagent supply at competitive prices through solicitation for such.

Implementation of this policy is of highest priority to the Company. The Fuels Department shall be organized and staffed, and fuel procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with this policy. Fuel, reagent, and related transportation shall be purchased at competitive prices considering all material factors. The factors include but are not limited to: quantity needed to maintain an adequate supply, quality necessary to ensure generating unit operating and maintenance characteristics and environmental standards, reliability of the supplier, creditworthiness, and forward planning to meet projected system requirements, and meeting emergency or other unusual circumstances that might affect operating conditions. From time to time, the Director of Fuels will review the Company's Fuel Procurement Policies and Procedures and recommend updates as appropriate.

C. Organization:



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Fuel Procurement Policies and Procedures

1. Department Structure. The Department shall be organized and staffed to effectively administer the Company's fuel procurement function.
2. Organizational Responsibility. The Chief Operating Officer to whom the Director reports, has the responsibility for fuel procurement. The Director is responsible for the Department. Other departments may be called upon by the Department to the extent the Director or Chief Operating Officer considers advisable in the execution of the functions of the Department.
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Director of Fuels which is specified in the single transaction authority limits by the Company. The Award Recommendation will be drafted by the Director, reviewed by Fuels legal counsel, and executed by the Chief Operating Officer within the authority granted by the Energy Related Transaction Authority Policy. Greater expenditures shall require the signature of the Company's President and Chief Executive Officer and within his trading authority as established by the Board of Directors. These levels of authority may be amended, supplemented, or superseded as dictated by the Company.
4. Reports. The Director will instruct the Department to prepare, maintain and distribute reports to management and others as deemed necessary for business operations and regulatory requirements.
5. Records. The Department shall maintain the following records:
 - a. Open Contract Files. The Department shall maintain the following on open status for at least one-year or longer as the contract term or other conditions warrant:
 1. For each current contract supplier, the files will contain:
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6. General Administrative Duties.

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D. Fuel Supply Procedures:

1. Projections. In conjunction with other departments of the Company, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in the Company's planning process.
2. Contract/Spot Mix. Subject to the approval of the ~~Chief Operating Officer~~ the Director shall determine whether a contract purchase is advisable, considering the following factors: (a) the availability of adequate supplies from qualified suppliers, (b) the advisability or need to have an adequate supply committed for an existing or planned unit (subject to inventory limits specified by the Company), (c) the desire to maintain practical flexibility as to market conditions and other factors affecting price and availability, (d) existing and anticipated environmental standards, (e) such other factors as may reasonably affect the implementation of the Company's Fuel Procurement Policy and (f) fuel impact on generation facilities' operation and maintenance.
3. Current Requirements. The Department shall review and analyze the data available to the Department for purposes of conducting fuel and reagent purchases in a timely manner to meet the requirements of the Company.
4. Supplier Qualifications. The Company shall select potential suppliers on the basis of evaluation, market intelligence, performance information (as available), industry research, and creditworthiness, as determined by the Director and his staff. No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

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A supplier evaluation (to include site visit and mine engineering and/or performance report) may be performed to determine if a supplier has the ability to deliver in the time frame requested the quantity and quality of coal or reagent bid at the offered price.

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All appropriate bid data shall be documented and electronically categorized for the process of evaluation of the various offerings of fuel and reagent. The documents shall be maintained in a secured area and shall be kept pursuant to normal record keeping practices.

- 6. Contract Awards. The Department shall review and analyze each Contract offer. The Director, or his/her representative, may engage in preliminary negotiations to determine which offers warrant further consideration. The Director and/or representative shall investigate the potential supplier and proposed source of supply; and, as to any offer for fuel, the Department shall verify the adequacy of the proposed source of supply as to quantity, quality, and timely deliverability.

The evaluation shall include, but not necessarily be limited to, the response to the RFQ (items required by the RFQ for satisfactory operational, environmental, and economic criteria); diversity of supply; supplier credit assessment; transportation mode and cost; and diversity of suppliers to provide the lowest evaluated cost of electrical energy to the Unit bus bar over the long term.

From this initial evaluation, a select group of potential suppliers (a “short-list”) of suppliers shall be developed for more in-depth evaluation. The Department may then engage in preliminary discussions to ensure that the offer warrants further evaluation and consideration. The objective of the negotiating discussions is to ensure that the Company achieves balanced terms and conditions and the lowest evaluated electrical energy delivered to the Unit bus bar and reliable supply consistent with other qualifiers related to supplier reliability, environmental restraints, transportation options, etc.

The recommended Supplier(s) shall be selected by the negotiating team based upon the evaluation criteria and the results of the negotiating discussions. The Department shall prepare a detailed Award Recommendation for approval. The Award Recommendation shall document the selection criteria and pertinent factors, and in circumstances where more than one company is selected, the recommendation shall describe the tonnage requirements and other responsibilities of each of the other recommended Suppliers.



BOARD POLICY

Fuel Procurement Policies and Procedures

Policy Number 120

Original Effective Date	<u>07/16/2009</u>	Approved by: Board
Original Approval Date	<u>12/21/2007</u>	
Date Last Reviewed	_____	
Date Last Revised	<u>02/20/2014</u>	

All contracts for which the term, tenor or notional amount exceed the limits specified for the Director of Fuels must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy.

- 7. Spot Purchases. Spot purchases may be made by the Company whenever considered advisable by the Director in furtherance of the Company's fuel and reagent needs, subject to the limit of authority as outlined by the Company.
- 8. Documentation. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of the Company. A purchase order may be issued for a spot purchase. A purchase order shall contain all terms of that purchase. Further, the Department shall maintain documentation of the final list (log) of bidders, a copy of the entire bid package; bidder's responses; and the bid evaluation summary used for decision support.
- 9. Fuel Oil. Fuel Supply Procedures principally address procurement of solid fuel. Fuel oil is procured on an "as-needed" basis due to the infrequency of use of this fuel and the nature of the oil markets. When the need for oil arises, the Fuels Department shall act to solicit vendors for offers. Orders are assigned on the basis of lowest delivered cost per gallon and ability to fill the order. Solicitation results shall be documented and purchase orders issued in the Fuels Department for those purchases initiated and completed by the Department.

Deleted: mmbtu

Fuel Supply and Reagent Agreement Administration:

- 1. Compliance. The Department shall review and analyze daily business and operational reports to properly administer all fuel and transportation agreements.
- 2. Coal weights. Coal weights shall be obtained by either the Company or by Supplier, upon agreement by Company. Coal weight is obtained by scale or draft method, depending upon Company site or methodology employed by Supplier to ascertain weights. In either event, coal weights are obtained by industry-accepted standards, and in cases where scales are utilized, are duly tested and maintained in proper order for such purpose. In cases where draft weights are utilized, the Company employs processes to verify actions to obtain draft weights and that such measures are by industry-accepted standards. Coal quantity is obtained by Station personnel and reported through the fuels information system or is provided by the Supplier pursuant to the contract agreement.
- 3. Coal sampling. Coal sampling and analysis shall be performed by either the Company or the Supplier, upon agreement by Company. Coal sampling and analysis shall be performed according to procedures adopted by the Company's laboratory in accordance with A.S.T.M. standards for coal sampling, coal sample preparation, coal sample identification, handling of sample, and coal analysis. Coal quality is assessed and reported through the fuels information system by the Company's laboratory personnel or is provided by the Supplier pursuant to the contract agreement.
- 4. Amendments. A contract shall not be materially amended except after analysis by the Department and recommendation of the Director of Fuels or the Chief Operating Officer. No material contract

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BOARD POLICY

Policy Number 120

Original Effective Date	<u>07/16/2009</u>	Approved by: Board
Original Approval Date	<u>12/21/2007</u>	
Date Last Reviewed	_____	
Date Last Revised	<u>02/20/2014</u>	

Fuel Procurement Policies and Procedures

or purchase order addendum shall be made except upon recommendation of the Director and subject to the approval limits of the Company.

5. Contract Administration. The Director and the Department shall remain informed as to the terms and conditions of each current contract, and maintain the necessary data to administer the contracts. Every supplier request for a change in terms, conditions, or prices must be written and supported by adequate data in conformity with the contract. Each such request shall be analyzed by the Department against the contract provisions, and reported with recommendations to the Director. After review by the Director, the supplier request and Department's recommendations shall be approved as required by the Company. If any request is not approved in whole or in part, the Director shall advise the supplier, specifying the Company's objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Company as dictated by contract terms shall be the primary method of resolving the issue.
6. Force Majeure. A supplier's claim for relief from compliance with fuel supply agreement terms due to force majeure conditions must be in writing with an adequate description of conditions warranting nonperformance. Each force majeure claim shall be reviewed by the Director and the company's legal counsel.
7. Inspections. The Director shall request inspections of mining and other facilities of a contract fuel and/or reagent supplier or other facilities as required or deemed necessary to manage the performance and contractual relationship (Contract Administration).

F. Fuel and Reagent Supply Agreement Enforcement:

1. General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by the Company in a reasonable, fair, and practical manner to achieve supplier compliance with the Company's overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
2. Director Responsibility. Whenever it is determined that a shipment does not meet Fuel Supply or Reagent Agreement terms, the Director, or his/her designee, shall inform the supplier and direct that subsequent shipments be in compliance. When necessary the Chief Operating Officer and the Director may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
3. Legal Assistance. The Department shall have access to, and shall receive advice from, legal counsel as provided by the Company on any matter relating to fuel, reagent, and related transportation procurement, contracts and amendments thereto, administration, and enforcement. Should a dispute as to a supplier's performance fail to be satisfactorily resolved by the Director, the matter shall be referred to legal counsel. Legal counsel may consider further negotiation, arbitration (if provided by the contract), or litigation. No arbitration or litigation shall commence except on the advice of said counsel with approval by senior management.

Deleted: VP Production

G. Inventory Levels:



BOARD POLICY

Policy Number 120

Original Effective Date	<u>07/16/2009</u>	Approved by: Board
Original Approval Date	<u>12/21/2007</u>	
Date Last Reviewed	_____	
Date Last Revised	<u>02/20/2014</u>	

Fuel Procurement Policies and Procedures

The Company has an obligation to ensure continuous low cost, reliable service to its members. Decisions affecting fuel inventory shall consider these obligations.

The Company shall maintain an adequate inventory while allowing for enough flexibility to permit inventory levels to be responsive to known and anticipated changes in conditions in an attempt to avoid risks and stoppages due to unforeseen conditions. Inventory shall be recommended based upon, but not limited to, supplier performance, environmental conditions, labor matters, logistical issues and concerns, and generation requirements and dispatch. The general level of inventory shall be monitored for such matters and recommendations to adjust inventory to meet anticipated conditions shall be made from time to time. Such inventory recommendations shall be made by the Director for approval by the Senior Management of the Company.

Coal inventories and reagent shall be monitored and reported regularly via the Company's fuel information system(s).

H. Emergency Procurement:

Any one or more of the procedures described herein may be waived by the ~~Chief Operating Officer~~, when, in the informed judgment of the Director, and on his recommendation, fuel must be purchased without complying with one or more of such provisions due to extraordinary conditions including strikes, lockouts or other labor problems affecting fuel production, embargoes, mining or other problems affecting production or transportation, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of fuel and reagent to the Company from its existing suppliers. When such a purchase is made, documentation of circumstances will be appended to the purchase order and/or contract file.

~~Deleted:~~
~~Deleted: VP Production~~

I. Transportation Services Contracts:

Transportation services bids shall be requested and Contracts negotiated whenever appropriate. Consideration shall be given to plant requirements, supplier loading capabilities, relative location of supplier to Stations, transportation mix, unloading capabilities and capacities at Stations, logistic constraints, transportation provider economics, Station material handling economics, and any other factor which might affect the delivery of Fuel and reagent to the Company's Stations.

Unless otherwise dictated by Emergency situations, the Solicitation process will be utilized for transportation services. The selection of transportation provider will generally be based upon, but not necessarily limited to cost, reliability, insurance, past / current performance, container availability and suitability for purpose, material handling capacities and constraints, transportation mix, and any other mitigating factors in terms of logistics.

All transportation service agreements shall be in written contractual form duly executed by an authorized supplier of service and the Company.

J. Ethics and Conduct:



BOARD POLICY

Fuel Procurement Policies and Procedures

Policy Number 120

Original Effective Date	<u>07/16/2009</u>	Approved by: Board
Original Approval Date	<u>12/21/2007</u>	
Date Last Reviewed	<u> </u>	
Date Last Revised	<u>02/20/2014</u>	

The Company recognizes the importance of following appropriate business ethics to guide the conduct of the Fuels Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of the Company including, but not limited to, the Business Ethics Policy and the Conflicts of Interest Policy for Big Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.

Fuels staff shall endeavor to serve the best interests of the Company, its Members, and stakeholders in the performance of their duties and responsibilities.

Number	Date	Notes	Approved by
Original	12/21/2007	Approved to be effective at close of unwind	Board
Rev. 1	03/16/2012	Update out of date language and staffing changes	Board
Rev. 2	03/14/2013	Update due to title change	
Rev. 3	02/20/2014	Add date last reviewed line, section header and change "mmBTU" to "gallon"	Board

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 16)**

- 2 a. *State whether Big Rivers is aware of any violations of its*
3 *policies and procedures regarding fuel procurement that*
4 *occurred prior to or during the period from November 1,*
5 *2013, through April 30, 2014.*
- 6 b. *If yes, for each violation:*
- 7 (1) *Describe the violation;*
8 (2) *Describe the action(s) that Big Rivers took upon*
9 *discovering the violation; and*
10 (3) *Identify the person(s) who committed the violation.*

11

12 **Response)**

- 13 a. Big Rivers is unaware of any violations of its policies and
14 procedures regarding fuel procurement that occurred during the
15 period November 1, 2013, through April 30, 2014. Big Rivers is
16 also unaware of any previously unreported violations of its
17 policies and procedures regarding fuel procurement.
- 18 b. Not applicable.

19

20

21 **Witness)** Mark W. McAdams

22

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
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**Response to Commission Staff's Request for Information
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August 27, 2014

1 *Item 17) Identify and explain the reasons for all changes in the*
2 *organizational structure and personnel of the departments or divisions*
3 *that are responsible for Big Rivers' fuel procurement activities that*
4 *occurred during the period from November 1, 2013, through April 30, 2014.*
5

6 **Response)** On December 21, 2013, Jeremy Garrett resigned from his position as
7 Logistics Coordinator within Big Rivers' fuel procurement organization. On
8 January 6, 2014, Jeffrey L. ("Jeff") Vandiver replaced Mr. Garrett with the title of
9 Senior Logistics Coordinator. Mr. Vandiver reports to Mark McAdams.

10 Within 75 days of April 30, 2014, the closing date for the current FAC
11 review period, there were additional changes to the reporting structure for Big
12 Rivers' fuel procurement organization. On June 20, 2014, Mark A. Bailey
13 announced his retirement, effective July 1, 2014, as Big Rivers' President and
14 Chief Executive Officer ("CEO"). Mr. Bailey's replacement as President and CEO
15 is Robert W. ("Bob") Berry, Big Rivers' former Chief Operating Officer. On July
16 11, 2014, Mr. Berry announced that James ("Jim") Garrett was promoted to the
17 position of Interim Vice President Production. Mr. Garrett was formerly Big
18 Rivers Sebree Station Plant Manager. Mr. Garrett, who plans to retire later in
19 2014, will serve as Interim Vice President Production until a permanent
20 replacement is selected.

21 An organizational chart reflecting these changes is attached hereto.
22 Other than the changes noted above, there have been no other changes in the
23 organizational structure and personnel of the departments responsible for Big
24 Rivers' fuel procurement activities during the period from November 1, 2013,
25 through April 30, 2014.

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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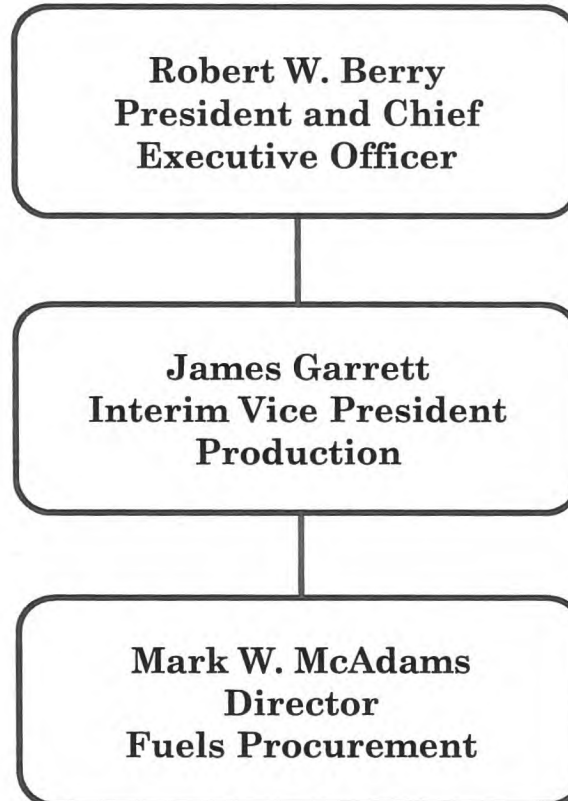
1

2

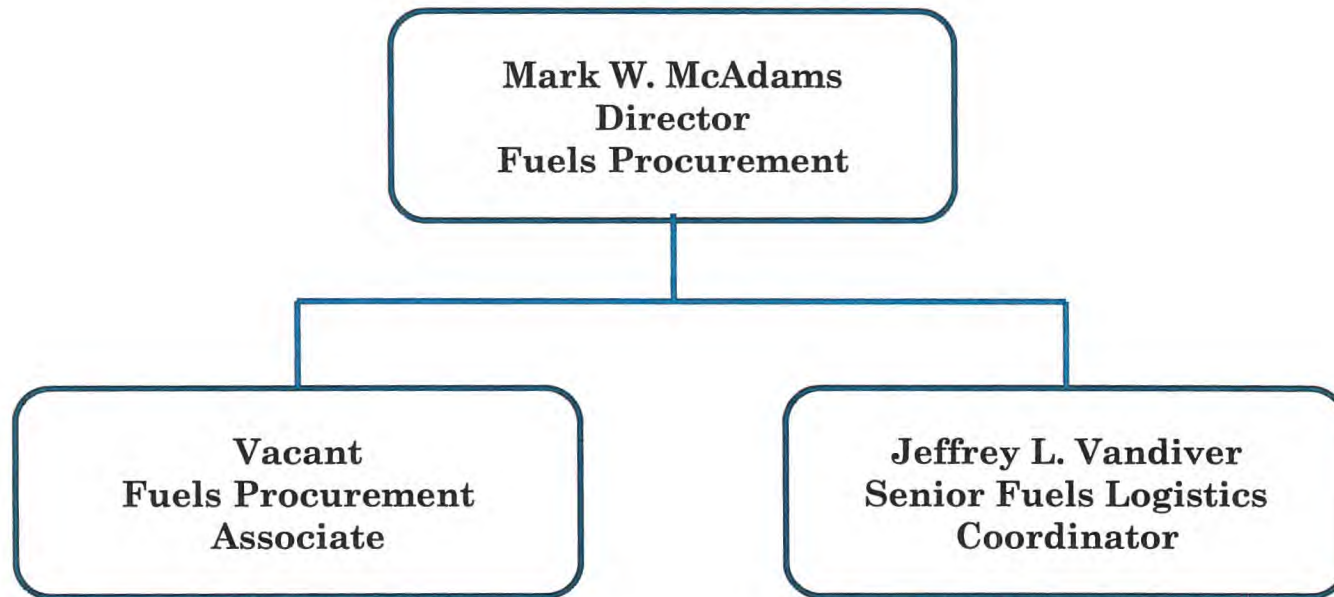
3 **Witness)** Mark W. McAdams

4

**Big Rivers Electric Corporation
Case No. 2014-00230
Coal Fuels Procurement Organization
July 2014**



**Big Rivers Electric Corporation
Case No. 2014-00230
Coal Fuels Procurement Organization
July 2014**



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
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August 27, 2014

1 **Item 18)**

- 2 a. *Identify all changes that Big Rivers has made during the*
3 *period under review to its maintenance and operation*
4 *practices that also affect fuel usage at Big Rivers'*
5 *generation facilities.*
6 b. *Describe the impact of these changes on Big Rivers' fuel*
7 *usage.*

8

9 **Response)**

- 10 a. The original 2014 operating plan that was approved by Big
11 Rivers' Board of Directors on December 20, 2013, called for the
12 Wilson unit to be idled on February 1, 2014, following the
13 departure of the Century Sebree Smelter from Big Rivers
14 system. However, Big Rivers Energy Services sold 200 MWs of
15 Wilson's generation through the end of April 2014 and the unit
16 continued to operate.
17 b. For the additional eighty-nine (89) days of generation at Wilson,
18 Big Rivers burned 392,989 tons of coal that were not included in
19 the originally approved operating plan.

20

21

22 **Witness)** Lawrence V. Baronowsky

23

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 19)** *List each written coal supply solicitation issued during the*
2 *period from November 1, 2013, through April 30, 2014.*

3

4 *a. For each solicitation, provide the date of the solicitation,*
5 *the type of solicitation (contract or spot), the quantities*
6 *solicited, a general description of the quality of coal*
7 *solicited, the time period over which deliveries were*
8 *requested, and the generating unit(s) for which the coal*
9 *was intended.*

10 *b. For each solicitation, state the number of vendors to*
11 *whom the solicitation was sent, the number of vendors*
12 *who responded, and the selected vendor. Provide the bid*
13 *tabulation sheet or corresponding document that ranked*
14 *the proposals. (This document should identify all vendors*
15 *who made offers.) State the reasons for each selection.*
16 *For each lowest-cost bid not selected, explain why the bid*
17 *was not selected.*

18

19 **Response)**

20 a. and b.

21 Big Rivers issued no written coal supply solicitations during the
22 period from November 1, 2013, through April 30, 2014.

23

24 **Witness)** Mark W. McAdams

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
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**Response to Commission Staff's Request for Information
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August 27, 2014

1 **Item 20)** *List each oral coal supply solicitation issued during the*
2 *period from November 1, 2013, through April 30, 2014.*

3
4 *a. For each solicitation, state why the solicitation was not*
5 *written, the date(s) of the solicitation, the quantities*
6 *solicited, a general description of the quality of coal*
7 *solicited, the time period over which deliveries were*
8 *requested, and the generating unit(s) for which the coal*
9 *was intended.*

10 *b. For each solicitation, identify all vendors solicited and*
11 *the vendor selected. Provide the tabulation sheet or other*
12 *document that ranks the proposals. (This document*
13 *should identify all vendors who made offers.) State the*
14 *reasons for each selection. For each lowest-cost bid not*
15 *selected, explain why the bid was not selected.*

16
17 **Response)**

18 a. and b.

19 Big Rivers issued no oral coal supply solicitations during the
20 period from November 1, 2013, through April 30, 2014.

21
22
23 **Witness)** Mark W. McAdams

24

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1 **Item 21)**

2 a. *List all intersystem sales during the period under review*
3 *in which Big Rivers used a third party's transmission*
4 *system.*

5 b. *For each sale listed above:*

6 (1) *Describe how Big Rivers addressed, for FAC reporting*
7 *purposes, the cost of fuel expended to cover any line*
8 *losses incurred to transmit its power across the third*
9 *party's transmission system; and*

10 (2) *State the line loss factor used for each transaction*
11 *and describe how that line loss factor was*
12 *determined.*

13

14 **Response)**

15 a. Big Rivers had no intersystem sales during the period under
16 review in which Big Rivers used a third party's transmission
17 system.

18 b.

19 (1) Not Applicable.

20 (2) Not Applicable.

21

22

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
dated August 13, 2014**

August 27, 2014

1

2 **Witnesses)**

3

a. Wayne O'Bryan

4

b.(1) Nicholas R. Castlen

5

b.(2) Wayne O'Bryan

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
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August 27, 2014

1 **Item 22)** *Describe each change that Big Rivers made to its methodology*
2 *for calculating intersystem sales line losses during the period under*
3 *review.*

4

5 **Response)** Big Rivers has made no changes during the period November 1, 2013,
6 through April 30, 2014, to its methodology for calculating intersystem sales line
7 losses.

8

9

10 **Witness)** Wayne O'Bryan

11

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
CASE NO. 2014-00230**

**Response to Commission Staff's Request for Information
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August 27, 2014

1 **Item 23)** *State whether, during the period under review, Big Rivers has*
2 *solicited bids for coal with the restriction that it was not mined through*
3 *strip mining or mountain top removal. If yes, explain the reasons for the*
4 *restriction on the solicitation, the quantity in tons and price per ton of the*
5 *coal purchased as a result of this solicitation, and the difference between*
6 *the price of this coal and the price it could have obtained for the coal if*
7 *the solicitation had not been restricted.*

8

9 **Response)** Big Rivers has not solicited any bids for coal with the restrictions
10 that it was not mined through strip mining or mountain top removal.

11

12

13 **Witness)** Mark W. McAdams

14

BIG RIVERS ELECTRIC CORPORATION

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FROM NOVEMBER 1, 2013 THROUGH APRIL 30, 2014
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**Response to Commission Staff's Request for Information
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August 27, 2014

1 **Item 24)** *Provide a detailed discussion of any specific generation*
2 *efficiency improvements Big Rivers has undertaken during the period*
3 *under review.*

4

5 **Response)** On April 26, 2014, Big Rivers started a twenty-one (21) day
6 maintenance outage on HMP&L Station Two Unit 1, in an attempt to restore
7 some of its original design efficiency. The average net heat rate on the unit from
8 January 2014 through April 2014 was 10,746 Btu/kWh. The average net heat rate
9 for the unit following the maintenance outage for May 2014 through July 2014
10 was 10,576 Btu/kWh, giving Big Rivers a 170 Btu/kWh net heat rate
11 improvement.

12

13

14 **Witness)** Lawrence V. Baronowsky

15

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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August 27, 2014

1 *Item 25) State whether any Midcontinent Independent System*
2 *Operator, Inc. costs were included in Big Rivers' monthly FAC filings*
3 *during the period under review. If yes, provide the amount of the costs by*
4 *month and by type of cost.*

5
6 **Response)** The only MISO costs included in Big Rivers' monthly FAC filings
7 during the period under review were energy costs associated with power
8 purchased from MISO. MISO charge types, for power purchases currently
9 included in Big Rivers' monthly FAC filings, include "Day Ahead Asset Energy",
10 "Real Time Asset Energy", "Real Time Excessive Energy", and "Real Time Non-
11 Excessive Energy".

12 The costs of power purchased from MISO for Domtar back-up energy,
13 forced outages, and inter-system sales are subtracted from the total cost of
14 purchased power included on page 2 (Fuel Cost Schedule) of the monthly Form A
15 Filings in the calculation of recoverable expenses for FAC purposes.

16 Please see the attachment to this response for a summary of the
17 MISO purchased power costs included in Big Rivers' monthly FAC filings during
18 the period under review.

19
20
21 **Witness)** Nicholas R. Castlen
22

Big Rivers Electric Corporation
MISO Purchased Power Costs Included in Monthly FAC Filings
November 2013 through April 2014

Reason for Purchase:

	Unscheduled Outages < 6 Hours	Available for System	Scheduled Outages	Domtar ¹	Cover Load & Lack of Generation	Derates & Curtailments	Inter-System Sales ²	Unscheduled Outages > 6 Hours ³	Total
Nov-13	\$ -	\$ 1,266,422	\$ -	\$ 69,991	\$ 66,120	\$ -	\$ 1,023,588	\$ 484,340	\$ 2,910,461
Dec-13	\$ 46,466	\$ 975,475	\$ -	\$ 75,595	\$ -	\$ -	\$ 901,133	\$ 1,304,390	\$ 3,303,059
Jan-14	\$ 160,723	\$ 1,704,101	\$ -	\$ 366,534	\$ 1,413,404	\$ -	\$ 1,017,840	\$ 2,657,071	\$ 7,319,673
Feb-14	\$ 3,445	\$ 538,445	\$ 199,312	\$ 161,683	\$ 196,544	\$ -	\$ -	\$ 370,699	\$ 1,470,128
Mar-14	\$ 18,122	\$ 1,116,528	\$ -	\$ 88,174	\$ 375,355	\$ -	\$ -	\$ 660,308	\$ 2,258,487
Apr-14	\$ 6,320	\$ 462,029	\$ 117,075	\$ 187,770	\$ 103,025	\$ -	\$ -	\$ -	\$ 876,219
Total	\$ 235,076	\$ 6,063,000	\$ 316,387	\$ 949,747	\$ 2,154,448	\$ -	\$ 2,942,561	\$ 5,476,808	\$ 18,138,027

Notes:

The "MISO costs" shown in the table above represent the cost of power purchased from MISO.

¹ The cost of power purchases for Domtar are removed from the calculation of recoverable fuel costs through the "Less Purchases for Domtar back up" amount on page 2, "Fuel Cost Schedule", in the monthly Form A Filings.

² Purchases for Inter-System Sales are removed from the calculation of recoverable fuel costs through the "Inter-System Sales" amount on page 2, "Fuel Cost Schedule", in the monthly Form A Filings.

³ Purchases for Unscheduled Outages > 6 hours are removed from the calculation of recoverable fuel costs through the "Identifiable fuel cost (substitute for Forced Outages)" amount on page 2, "Fuel Cost Schedule", in the Form A Filings.



BIG RIVERS ELECTRIC CORPORATION

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August 27, 2014

1 **Item 26)** *Provide the date System Support Resource status expired for*
2 *the Coleman Station and the date the station was idled. Include in the*
3 *response the length of time required to idle the station.*

4
5 **Response)** The SSR status expired for the Coleman Station at 00:00 on May 1,
6 2014. Coleman Unit 1 was placed in inactive reserve status for idling on May 1,
7 2014, at 00:00. Coleman Unit 2 was placed on inactive reserve status for idling on
8 May 1, 2014, at 11:16. Coleman Unit 3 was placed on inactive reserve status for
9 idling on May 8, 2014, at 17:54.

10 The Coleman Station idling process commenced at 00:00 on May 1,
11 2014, and at 00:00 on July 20, 2014, eighty (80) days later, the procedure was
12 completed.

13

14

15 **Witness)** Lawrence V. Baronowsky

16



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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**Response to Commission Staff's Request for Information
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August 27, 2014

1 **Item 27)** *Explain how purchase power costs are accounted for in the*
2 *calculation of the FAC when Big Rivers experiences a planned generation*
3 *outage and purchases power to meet load (i.e., is the entire amount of the*
4 *purchase power recorded in the calculation, or is there a limit as to the*
5 *amount recorded?). If there is a limit, explain the basis for the limitation*
6 *and how it is calculated. If there is no limit, explain the basis for*
7 *including 100 percent of the purchase power costs.*

8

9 **Response)** The energy cost of power purchased to meet load requirements
10 during planned generation outages is included in the calculation of Big Rivers'
11 monthly FAC factor, and appears in Big Rivers' monthly Form A Filings on page
12 2, Fuel Cost Schedule, in the Purchases, "Identifiable Fuel Cost – Other
13 Purchases" line item.

14 The cost of these power purchases recovered through the FAC is
15 limited to the \$/kWh cost of Big Rivers' highest cost generating unit available
16 during the respective expense month. If the \$/kWh cost of the purchased power
17 exceeds the \$/kWh cost of the highest cost generating unit, the excess is included
18 in the "Less Purchases Above Highest Cost Units" line item on page 2 of the Form
19 A Filing and subtracted from the recoverable fuel expense.

20

21

22 **Witness)** Nicholas R. Castlen

23



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1 **Item 28)** *Explain how purchase power costs are accounted for in the*
2 *calculation of the FAC when Big Rivers is not experiencing a generation*
3 *outage but must purchase power in order to meet demand (i.e., is the*
4 *entire amount of the purchase power recorded in the calculation, or is*
5 *there a limit as to the amount recorded?). If there is a limit, explain the*
6 *basis for the limitation and how it is calculated. If there is no limit,*
7 *explain the basis for including 100 percent of the purchase power costs.*

8
9 **Response)** The energy cost of power purchased to meet demand when Big Rivers
10 is not experiencing a generation outage is included in the calculation of Big Rivers'
11 monthly FAC factor, and appears in Big Rivers' monthly Form A Filings on page
12 2, Fuel Cost Schedule, in the Purchases, "Net Energy Cost – Economy Purchases"
13 or "Identifiable Fuel Cost – Other Purchases" line item, depending on the
14 classification of the purchase.

15 The cost of these power purchases recovered through the FAC is
16 limited to the \$/kWh cost of Big Rivers' highest cost generating unit available
17 during the respective expense month. If the \$/kWh cost of the purchased power
18 exceeds the \$/kWh cost of the highest cost unit, the excess is included in the "Less
19 Purchases Above Highest Cost Units" line item on page 2 of the Form A Filing and
20 subtracted from the recoverable fuel expense. Additionally, if the power
21 purchased is for supplemental and back-up energy sales to smelters, Domtar back
22 up power, or inter-system sales, the amount is included in the "Less Purchases for
23 Supplemental and Back-Up Energy to Smelters", "Less Purchases for Domtar
24 Back-Up", or "Inter-System Sales - Including Interchange-out" line item,
25 respectively, and subtracted from the amount recoverable through the FAC.

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1

2

3 **Witness)** Nicholas R. Castlen

4



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1 **Item 29)** *If Big Rivers is familiar with the term "no load costs," provide*
2 *a definition of the term and responses to the following:*

- 3
- 4 *a. If all or a portion of these costs are recovered through the*
5 *FAC, explain how these costs are calculated and allocated*
6 *between native-load sales and off-system sales each hour.*
- 7 *b. By month and generating unit, provide the amount of "no*
8 *load costs" that have been allocated each to native-load*
9 *customers and off-system sales from November 1, 2012,*
10 *through April 30, 2014.*

11

12 **Response)** The book *Fundamentals of Power System Economics* defines no-load
13 cost as the theoretical cost for a unit "... to remain connected to the system while
14 supplying non electrical power, the no-load cost represents the cost of fuel
15 required to keep the unit running. Such a mode of operation is not possible for
16 most thermal generating units. The no-load cost is simply the constant term in
17 the cost curve and does not have physical meaning."¹

18 In the MISO market, in order to build an incremental cost curve for
19 offering units for economic dispatch, MISO utilizes a calculated reference value
20 known as no-load cost; however, this calculation is merely a reflection of the
21 beginning of the incremental cost curve.

¹ Kirschen, Daniel Sadi and Strbac, Goran. *Fundamentals of Power Economics*.
West Sussex, England: John Wiley and Sons, 2004. page 84

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1 Big Rivers concurs with this definition and simplifies it as “no-load
2 costs are the cost of operating generation at zero MWs.” Big Rivers utilizes
3 startup fuel to achieve synchronous speed, then immediately ties units online.
4

5 a. The no-load cost is a cost Big Rivers does not quantify because
6 Big Rivers does not operate at a no-load state. Big Rivers' units
7 are set to begin generating positive MWs immediately upon
8 connection to the system. Any theoretical costs required to
9 operate Big Rivers' units at zero MWs are embedded in Big
10 Rivers' total fuel cost for generating, and Big Rivers makes no
11 attempt to segregate no-load costs from the average cost of
12 generating MWs. Thus, there is no distinction made in the
13 allocation of these theoretical costs between native-load and off-
14 system sales.

15 b. Any theoretical cost of operating at zero MW output is
16 embedded in total fuel costs and is not quantifiable, nor treated
17 differently, between native sales and off-system.
18
19

20 **Witnesses)** Wayne O'Bryan (*No Load Costs' definition*) and
21 Nicholas R. Castlen (*FAC treatment of 'No Load Costs'*)
22

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**Witnesses: Wayne O'Bryan (*No Load Costs' definition*) and
Nicholas R. Castlen (*FAC treatment of 'No Load Costs'*)**

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1 **Item 30)** *State whether Big Rivers outsources coal handling or whether*
2 *coal handling is performed by Big Rivers' employees and explain how*
3 *coal-handling costs are accounted for in the calculation of the FAC.*

4

5 **Response)** Coal handling is performed by Big Rivers' employees at the
6 generating stations. Coal handling expenses are not included in the calculation of
7 the FAC.

8

9

10 **Witnesses)** Mark W. McAdams (*Coal Handling Outsourcing*) and
11 Nicholas R. Castlen (*Coal Handling Cost in FAC*)

12

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**Witnesses: Mark W. McAdams (*Coal Handling Outsourcing*) and
Nicholas R. Castlen (*Coal Handling Cost in FAC*)**

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1 **Item 31)** *State whether all long-term fuel transportation contracts have*
2 *been filed with the Commission. If any contracts have not been filed,*
3 *provide a copy.*

4

5 **Response)** All long-term fuel transportation contracts have been filed with the
6 Commission.

7

8

9 **Witness)** Mark W. McAdams

10



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1 **Item 32)** *For each generating station:*

2

3

a. State how often coal-pile surveys are undertaken;

4

*b. Explain how any resulting adjustment affects fuel costs in
the calculation of the FAC;*

5

6

*c. Provide the costs of performing a coal-pile survey at each
of the generating stations and explain how the costs are
accounted for; and*

7

8

9

*d. Provide a copy of all internal accounting policies related
to coal-pile survey adjustments and the date the policies
were last revised.*

10

11

12

13 **Response)** For Big Rivers solid fuel (coal and petroleum coke) pile surveys:

14

15

a. Coal pile surveys are performed annually, most often performed
in the third quarter of the year.

16

17

b. Big Rivers bids and contracts with an independent firm to
survey the physical coal inventories at each station. The survey
process usually requires approximately sixty days for
completion. Following the physical survey, the gain or loss
adjustment for each station according to solid fuel type is
calculated. The tonnage of the gain or loss is an adjustment line
added to the fuels accounting inventory roll-forward beginning
balance, followed by the addition of the purchases for the
current month and a new weighted-average solid fuel cost is

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1 cost for 2014 to be under \$40,000 since there will be no stockpile
2 to evaluate at Coleman Station.

3 d. Big Rivers' Fuel Procurement Policies and Procedures (Policy
4 No. 120), Section G. Inventory, states that Big Rivers shall
5 maintain an adequate inventory. Furthermore, Big Rivers'
6 policy is to adjust the inventory tonnage by the amount of the
7 physical survey gain or loss in the month in which the survey is
8 timely completed, typically October of the current fiscal year,
9 which will result in a weighted-average fuel cost for the 12-
10 month fiscal year at approximately the cost of monthly
11 purchases. The general level of inventory is monitored and
12 recommendations to adjust inventory are made from time-to-
13 time.

14 Corporate Accounting performs an independent survey of
15 solid fuel inventory via the annual stockpile inventory to verify
16 any differences between the physical solid fuel on the coal pile at
17 a generating station compared to the accounting roll-forward
18 books of record, and makes adjustments from the physical
19 quantity to the books of record quantity to ensure that the
20 physical is reconciled to the books of record at least once a year.
21 Although there is not a written Accounting Policy, the process
22 and its procedures have been in effect since 1980 and possible
23 prior to this year, and were re-established following the Unwind
24 Transaction in 2009. This process has been noted in footnotes in
25 Big Rivers' monthly Form B filings each year when the

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1 adjustments are made to the inventory roll-forward(s). Big
2 Rivers' Fuel Procurement Policies and Procedures (Policy No.
3 120) is provided in Big Rivers' response to Item 15.

4
5
6
7

Witness) Mark W. McAdams