

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)	
CORPORATION FOR AUTHORITY TO ESTABLISH)	CASE NO.
REGULATORY ASSETS FOR EXPENSES RELATED)	2015-00333
TO THE COAL COMBUSTION RESIDUALS RULE)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation ("Big Rivers"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

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

Big Rivers shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Big Rivers fails or refuses to furnish all or part of the requested information, Big Rivers shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Big Rivers shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1 Refer to the response to Commission Staff's Initial Request for Information ("Staff's Initial Request"), Item 1.a., where it states, in regards to the Effluent Limit Guidelines for Steam Electric Power rule, that "[t]he final version of these regulations differed from the proposed regulations in that the proposed regulations exempted power plants less than 400 MW from certain requirements but the final regulations do not contain that exemption." Identify the "certain requirements" referenced in this statement that were affected by this change.

2 Refer to the responses to Staff's Initial Request, Item 2.c., page 6 of 13, and Item 2, Attachment 6 of 8. Item 2.c. lists a total cost of \$4,181,000, and Attachment 6 of 8 to Item 2 lists a total cost of \$4,268,000. Explain the differences in the costs contained in the responses.

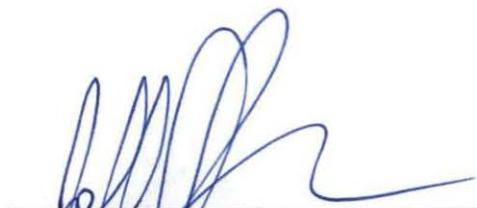
3. Refer to the responses to Staff's Initial Request, Item 2.c., page 8 of 13, and Item 2, Attachment 4 of 8, page 1. Item 2.c. lists a total cost of \$4,565,700, and Attachment 4 of 8 to Item 2 lists an estimated cost of retirement obligation (Today's

Dollars) of \$4,653,000, Explain the differences in the costs contained in these responses.

4. Refer to the response to Staff's Initial Request, Item 1.d. Describe the steps Big Rivers has taken to determine whether the soils at the Coleman generating station are suitable to cover Coleman's ash ponds if that becomes necessary. Provide the findings from these initial steps.

5. Refer to the response to Staff's Initial Request, Item 2.b. Explain the manner and time frame in which Big Rivers intends to recover the actual costs associated with complying with the Disposal of Coal Combustion Residuals from Electric Utilities Rule.

6. Refer to the response to Staff's Initial Request, Item 2.b., regarding Burns & McDonnell Engineering Co., Inc.'s study of Big Rivers' obligations for closure of its ash ponds. Provide a copy of this study.



Jeff Derouen
Executive Director
Public Service Commission
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DATED NOV 20 2015

cc: Parties of Record

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