Tyson Kamuf, Esq. tkamuf@smsmlaw.com

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SULLIVAN, MOUNTJOY, STAINBACK & MILLER, P.S.C. Attorneys

Skill. Integrity. Efficiency.

February 17, 2017

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FEB 20 2017 PUBLIC SERVICE COMMISSION

Via Federal Express

Dr. Talina R. Mathews Executive Director Public Service Commission 211 Sower Boulevard, P.O. Box 615 Frankfort, Kentucky 40602-0615

> Re: In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2014 through October 31, 2016 Case No. 2017-00006

Dear Dr. Mathews:

Enclosed for filing on behalf of Big Rivers Electric Corporation are an original and ten (10) copies of (i) Big Rivers' responses to the information requested in Appendix B of the Public Service Commission's February 6, 2017, order in the above-referenced matter; (ii) the direct testimonies of Mark W. McAdams and Wayne O'Bryan; and (iii) a petition for confidential treatment. There are no other parties to this proceeding upon whom copies of these documents must be served.

Sincerely,

Tyson Kamuf Counsel for Big Rivers Electric Corporation

TAK/lm Enclosures

cc: DeAnna Speed





RECEIVED

FEB 2 0 2017 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) FROM) NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016)

Case No. 2017-00006

DIRECT TESTIMONY

OF

MARK W. McADAMS DIRECTOR, FUELS PROCUREMENT

ON BEHALF OF

BIG RIVERS ELECTRIC CORPORATION

FILED: FEBRUARY 20, 2015



1		DIRECT TESTIMONY
2 3		OF MARK W. McADAMS
4		
5	Q.	Please state your name, business address and occupation.
6	A.	My name is Mark W. McAdams, and my business address is Big Rivers
7		Electric Corporation ("Big Rivers"), 201 Third Street, Henderson, Kentucky,
8		42420. I am the Director, Fuels Procurement for Big Rivers. During the
9		review period, I have reported to Robert W. Berry (formerly Chief
10		Operating Officer, now President and Chief Executive Officer) and to James
11		R. Garrett, Interim Vice President, Production. As of February 10, 2015, I
12		report to Michael T. Pullen, Vice President, Production.
13		
14	Q.	Please summarize your education and professional experience.
15	A.	I have Bachelor's degrees in Biology, Psychology, and Business, as well as a
16		Master of Business Administration with a Management emphasis. I am
17		also certified in purchasing management (C.P.M.) and a member of the
18		Institute of Supply Management. I was a Domestic and Industrial
19		Marketing Representative for Chevron U.S.A, prior to joining Louisville
20		Gas and Electric Company ("LG&E") in 1990. During my tenure at LG&E,
21		I served as logistics coordinator and contract administrator. In July 1998, I
22		was transferred to the Western Kentucky Energy Corp. ("WKE") subsidiary
23		and became the Manager, Fuels Strategy and Procurement. I left WKE on

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 $\left(\begin{array}{c} \end{array} \right)$

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Case No. 2017-00006 Direct Testimony of Mark W. McAdams Page 1 of 8

1		December 31, 2007, to assume the responsibilities of the Director Fuels
2		Procurement for Big Rivers.
3		
4	Q.	Please summarize your duties at Big Rivers.
5	A.	I am responsible for Big Rivers' procurement of solid fuel, fuel oil, flue-gas
6		desulphurization bulk reagent (lime and limestone), and related logistics
7		associated with the delivery of the foregoing materials
8		
9	Q.	Have you previously testified before this Commission?
10	A.	Yes. During my tenure with LG&E, I testified in LG&E's fuel reviews.
11		During my time at Big Rivers, I have testified in Big Rivers' six-month and
12		two-year fuel adjustment clause ("FAC") reviews since 2009.
13		
14	Q.	What is the purpose of your testimony in this proceeding?
15	A.	The purpose of my testimony is to describe Big Rivers' procurement
16		practices for fuel as they relate to the FAC for the period from November 1,
17		2014, through October 31, 2016 (the "Review Period").
18		
19	Q.	Have Big Rivers' coal suppliers adhered to their contract delivery
20		schedules during the Review Period?
21	A.	Yes, the majority of coal supply contracts are compliant with contract
22		delivery schedules that were established during the time frame of the

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Case No. 2017-00006 Direct Testimony of Mark W. McAdams Page 2 of 8

,

1 Review Period. During the Review Period, Big Rivers received a notice of 2 mine idling by Alliance / Sebree Mining (Onton mine), shifting coal supply 3 sourcing to Alliance Coal subsidiaries River View mining and Webster 4 County (Dotiki) mining operations. Also, during this review period, Patriot 5 Coal elected to sell their Patriot Highland operations to Alliance. Alliance. 6 thereafter, elected to close the Highland mining operation. Remaining coal 7 supply pursuant to the Patriot Highland Coal Supply Agreement was thereafter sourced first from the Sebree Mining / Onton mining operations; 8 9 then, upon their idling, from the River View mining operation.

10 From time-to-time, there are various impediments to delivery (mine 11 operations, river-related matters of freezing, flooding and/or drought, 12 equipment break-down, etc.) that cause delays. Most often, shipments are 13 rescheduled to deliver the product at a later date, via alternate mode of 14 transportation, or carried forward into the subsequent month or quarter to complete delivery. Such make up of delayed tonnage is based upon the 15 16 contractual language of the coal supply agreement and the reason for delay 17 (i.e., force majeure). All (100%) of contractual deliveries were achieved in 18 2016.

19

Q. What efforts has Big Rivers made in general to help ensure coal
 suppliers' adherence to contract delivery schedules during the
 Review Period?

A. 1 Big River's fuel department personnel reviews its delivery schedules with 2 suppliers and its generating station contacts on a daily basis to ensure that 3 scheduled tonnage has been completed during the course of the term of the 4 contractual agreement. In the event of delay (mining and/or logistics 5 issues), the parties confer and agree upon revised schedules to ensure 6 completion of contractual tonnage amounts. In the event of an extended 7 force majeure, the non-declaring party has a contractual option as to 8 whether to reschedule any shortfall tonnage. Contractual documents for 9 coal supply denote that time is of the essence in regard to coal delivery and 10 that failure to deliver is a material breach of the contractual agreement 11 which could result in termination of the coal supply agreement. Big Rivers 12 has not had, to date, a situation where it needed to invoke contract 13 language regarding delinquent or missed shipments. In such an event, the 14 supplier would be provided notice of its material breach of non-delivery 15 pursuant to the contractual agreement and would be obligated to remedy 16 such default or face the potential termination of the agreement.

17

Q. What efforts has Big Rivers made to maintain the adequacy of its
 coal supplies in light of any coal supplier's inability or
 unwillingness to make coal contract deliveries?

A. Big Rivers makes reasonable efforts to work with its suppliers to set
 delivery schedules and to reschedule shipments, in a timely fashion, in the

event of delays. In the event of an extended delay, such as a force majeure, Big Rivers would and has sought alternative spot supply to cover any shortfall due to such extended delay(s). Big Rivers also maintains a reasonable inventory supply at each generating station as a buffer to ensure that it has adequate fuel supply at all times, despite delayed or interrupted shipment deliveries. When contract conditions will allow, Big Rivers also seeks optional tonnage within its coal supply agreements to assist during shipment shortfalls.

9

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7

10 Q. Please describe any changes in coal market conditions that 11 occurred during the Review Period or that Big Rivers expects to 12 occur within the next two years that have significantly affected or 13 will significantly affect Big Rivers' solid fuel procurement 14 practices.

15 Α. The U.S. coal industry will continue to be challenged by competition from 16 natural gas, depressed coal prices, lengthened recession, and more 17 stringent environmental regulation. During the window of this Review 18 Period, several coal companies have exited and several others have declared 19 bankruptcy (Arch, Peabody, etc.). More industry participants will find 20 themselves challenged in regard to obtaining financing for expansion of 21 existing operations or initiating new projects. It is likely that overall U.S. 22 coal production will stabilize over 2017 and 2018. Despite depletion and

> Case No. 2017-00006 Direct Testimony of Mark W. McAdams Page 5 of 8

1 some production cuts in certain basins, the Illinois Basin is anticipated to 2 continue production and perhaps even slightly increase its output, which 3 may cause coal pricing to remain flat to very modestly increasing over the 4 next two years. Recent excess inventory situations and reduced coal-fired 5 generation demand have created pricing pressures on many suppliers. Continued lack of demand could lead to some very aggressive price 6 7 competition, as there could be overcapacity in a shrinking coal-fired 8 generation market. Some coal producers have taken steps to reduce 9 existing production and delay or forego intended expansion of either 10 existing or new mining reserves. Utilities are utilizing incremental inventory built during the period of the past two years during the period of 11 12 low natural gas prices and the recession. Once those inventories are back 13 within target ranges, utilities may once again be entering the market for 14 forward coal supplies.

15 Over the period in review, and in the near term, Big River's fuel 16 procurement practices have not been adversely impacted, although the 17 Company did build inventory levels. Over the course of time, inventory has 18 been and will continue to be reduced. The potential change of all of these 19 various market pressures could bring about challenges in the coal producing sector. Coal companies may elect to merge/consolidate or sell 20 21 assets, creating a smaller marketplace for utilities to source coal supply. 22 Big Rivers will continue to actively survey the marketplace for

> Case No. 2017-00006 Direct Testimony of Mark W. McAdams Page 6 of 8

1

opportunities to secure its fuel supply for short and long-term business, weighing these market forces while making procurement decisions.

3

2

4 Q. Have Big Rivers' fuel procurement purchases and practices for 5 solid fuel during the Review Period been reasonable?

6 A. Yes. During the course of this Review Period, Big Rivers' practices have 7 included a determined focus on the reduction of inventory, and use at times, 8 of spot, lower cost alternative fuel. Big Rivers continues to review and 9 appropriately act in the spot and mid-term fuel and logistics market, in a 10 concerted and planned fashion, to attempt to limit its exposure to volatility 11 in the marketplace and to ensure competitive and reliable fuel supply to its 12 generating stations. Big Rivers' fuel procurement practices include 13 interaction with various departments within the company (finance, risk 14 management, generation planning, operations, energy marketing, and 15 material handling) to ensure that any fuel supply agreements being 16 established meet the planned generation and inventory goals of the 17 company. Solid fuel is secured after evaluation of quality, reliability, and 18 competitiveness of the provider. Big Rivers strives for transparency within 19 and outside of the cooperative, ensuring that its procurement practices are 20 sound, ethical, and appropriate for the intended purpose. The company 21 engages in formal competitive bid processes and engages internal controls 22 (internal bid opening processes to include multiple persons and

departments, bid tabulation and review by varying constituencies of the 1 2 management evaluation) and internal risk company, to ensure 3 transparency, accountability, and appropriate officer and management level 4 approval for procurement action. The Company's fuel procurement costs 5 are competitive as compared to the fuel benchmarking performed amongst Kentucky utilities. 6

7

8 Q. Does this conclude your testimony?

9 A. Yes.

Case No. 2017-00006 Direct Testimony of Mark W. McAdams Page 8 of 8

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

VERIFICATION

I, Mark W. McAdams, verify, state, and affirm that I prepared or supervised the preparation of the Direct Testimony filed with this Verification, and that Direct Testimony is 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 // day of February, 2017.

Katherin Rolu

Notary Public, Kentucky State at Large

My Commission Expires

10-31-2020

ORIGINAL



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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 FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016

Case No. 2017-00006

DIRECT TESTIMONY

OF

MURRAY W. (WAYNE) O'BRYAN DIRECTOR, POWER SUPPLY AND MARKET OPERATIONS

ON BEHALF OF

BIG RIVERS ELECTRIC CORPORATION

ORIGINAL

FILED: FEBRUARY 20, 2015

1		DIRECT TESTIMONY
2 3		OF WAYNE O'BRYAN
4		
5	Q.	Please state your name, business address, and position.
6	А.	My name is Wayne O'Bryan. I am employed by Big Rivers Electric
7		Corporation ("Big Rivers"), 201 Third Street, Henderson, Kentucky 42420, as
8		Director Power Supply and Market Operations. I report to Mark Eacret, Vice
9		President Energy Services.
10		
11	Q.	Please describe your job responsibilities.
12	А.	As Director of Power Supply and Market Operations, I am responsible for
13		coordination of daily Midcontinent Independent System Operator, Inc.
14		("MISO") market activities that include unit offer strategy, interface with
15		ACES Power Marketing, and oversight of the market Awards Process. A
16		Senior Power Portfolio Optimization Analyst reports to me. We work
17		together to pursue short term energy, capacity, and transmission sales that
18		support the best interests of Big Rivers. Other responsibilities include
19		scheduling SEPA energy and capacity, natural gas account management,
20		contract management, interface with the MISO Independent Market
21		Monitor, and performing a variety of official roles within the MISO structure.
.22		
23	Q.	Briefly describe your education and work experience.

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Case No. 2017-00006 Direct Testimony of Wayne O'Bryan Page 1 of 5

1 A. I began my employment with Big Rivers in 1978 in the Operations 2 Department. I worked my way through the various classifications including 3 supervision while being stationed at all of the Big Rivers locations. Beyond 4 my time in Operations, I have performed a variety of functions for the 5 company including DCS controls installation, Performance/Environmental, 6 PI System Programming, Manager of Production Services, and Plant 7 Manager at Coleman Station. I entered the Energy Services department in 8 my current role in September 2013. I have an Associate of Science Degree in 9 Business from Brescia University and post graduate work in Software 10 Engineering. During my career, I have attended an extensive list of 11 technical/computer classes. 12 13 Q. Have you previously testified before this Commission? 14 A. Yes. I testified at the hearings in Big Rivers' last two six-month fuel 15 adjustment review ("FAC") review proceedings. 16 17 Q. What is the purpose of your testimony in this proceeding? 18 A. The purpose of my testimony is to describe Big Rivers' fuel procurement 19 practices in relation to natural gas as this is my area of responsibility. 20 21 Q. Discuss the reasonableness of Big Rivers' fuel procurement 22 practices during the review period.

> Case No. 2017-00006 Direct Testimony of Wayne O'Bryan Page 2 of 5

1 A. Big Rivers' currently has one natural gas fired generator. It is the Reid 2 Combustion Turbine. It is operated as a peaking unit and for reliability needs 3 within the MISO system. Big Rivers purchases gas on the spot market when 4 the Combustion Turbine is needed. Big Rivers' agent (ACES) has gas traders 5 on their staff that procure the gas for the turbine when it is required. ACES 6 gas traders keep a list of available gas supply companies so they can have a 7 variety of choices if the need arises. We have a transmission agreement with 8 Texas Gas to supply the gas to the Combustion Turbine. This is an 9 interruptible service that is appropriate for the level of use. The Combustion 10 Turbine does not operate on a daily basis and it does not warrant a firm gas 11 contract which has a higher cost. Our gas procurement efforts during the 12 review period have been reasonable and practical and represent the least cost 13 methodology of procuring gas for the operation of the Combustion Turbine.

14

15 Q. Discuss natural gas suppliers' adherence to contract delivery 16 schedules during the review period.

A. Big Rivers' transmission agreement with Texas Gas allows for the borrowing
of gas from their system. This is a readily available supply. ACES traders
then purchase the appropriate amount of gas and pay Texas Gas back for the
amount borrowed. This is an efficient procurement system that has not
caused any delivery schedule issues during the review period.

22

Q. Discuss Big Rivers' efforts to ensure gas suppliers' adherence to
 contract delivery schedules during the review period.

A. Big Rivers has a variety of gas suppliers available to the ACES traders for
 gas procurement. The gas market is very competitive and if contract delivery
 issues with a particular company become a problem it is easy to find another
 suitable company to do business with.

7

8 Q. Discuss Big Rivers' efforts to maintain the adequacy of its natural
 9 gas supplies in light of any supplier's inability or unwillingness to
 10 make contract deliveries.

11 A. The companies that ACES gas traders do business with represent the gas 12 market from which Big Rivers' gas is supplied. This market is monitored 13 every day for the best gas prices available. There are also peripheral markets 14 monitored that can be utilized for cheaper pricing should the need arise. This 15 combination of markets provides enough available volume to ensure the 16 adequacy of natural gas supply for Big Rivers' needs.

17

Q. Discuss any changes in natural gas market conditions that occurred
 during the review period or that Big Rivers expects to occur within
 the next two years that have significantly affected or will
 significantly affect Big Rivers' natural gas procurement practices.

Case No. 2017-00006 Direct Testimony of Wayne O'Bryan Page 4 of 5 A. An abundant natural gas supply has contributed to conservative forward
 price forecasts for gas and energy for the next several years. As a result of
 this consistency in price forecasting Big Rivers doesn't expect any significant
 changes in gas market conditions. This consistency will also contribute to
 similar gas procurement practices for the foreseeable future.

6

7 Q. Discuss any changes in wholesale electric power market that
8 occurred during the review period or that Big Rivers expects to
9 occur within the next two years that have significantly affected or
10 will significantly affect Big Rivers' electric power procurement
11 practices.

12 A. Natural gas pricing has proven to have a direct correlation with energy 13 prices. As previously discussed this has led to conservative and reasonably 14 consistent forward energy price predictions. The price forecasts that exist 15 should not significantly alter Big Rivers' current electric power procurement 16 practices.

17

18 Q. Does this conclude your testimony?

- 19 A. Yes.
- 20

Case No. 2017-00006 Direct Testimony of Wayne O'Bryan Page 5 of 5

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

VERIFICATION

I, Murray (Wayne) O'Bryan, verify, state, and affirm that I prepared or supervised the preparation of the Direct Testimony filed with this Verification, and that Direct Testimony is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Murray (Wayne) O'Bryan

COMMONWEALTH OF KENTUCKY) COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Murray (Wayne) O'Bryan on this the 26^{46} day of February, 2017.

Notary Public, Kentucky State at Large

My Commission Expires

10-31-2020





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 FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016

Case No. 2017-00006

Responses to Commission Staff's Request for Information dated February 6, 2017

FILED: February 20, 2017



AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

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 day of February, 2017.

athenin Tola

Notary Public, Kentucky State at Large

My Commission Expires

10-31-2020

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

VERIFICATION

I, Murray (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.

COMMONWEALTH OF KENTUCKY) COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Murray (Wayne) O'Bryan on this the $\frac{1672}{10}$ day of February, 2017.

Notary Public, Kentucky State at Large

My Commission Expires

10-31-2020

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

VERIFICATION

I, Roger D. Hickman, 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.

Roger D. Hickman

COMMONWEALTH OF KENTUCKY) COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Roger D. Hickman on this the day of February, 2017.

Katherie

Notary Public, Kentucky State at Large

My Commission Expires

0.31-2020

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

VERIFICATION

I, Jason C. Burden, 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.

Jan C. Burden

COMMONWEALTH OF KENTUCKY) COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Jason C. Burden on this the day of February, 2017.

Kathenen

Notary Public, Kentucky State at Large

My Commission Expires

10-31-2020

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

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 $\frac{16^{10}}{10^{10}}$ day of February, 2017.

Notary Public, Kentucky State at Large

My Commission Expires

10.31-2020



AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 Item 1) If a change in the base fuel cost is proposed, state the month to 2 be used as the base period (b). If the base period results in a fuel cost 3 other than one representative of current costs as prescribed by 807 KAR 4 5:056, Section 1(2), explain why this base period was selected. If no change 5 is proposed, include an explanation of the reason(s) Big Rivers believes 6 the current base period fuel cost should remain unchanged.

7

8 **Response)** Since Big Rivers regained functional control of its generating units in 9 July 2009, there have been three Fuel Adjustment Clause ("FAC") reviews in 10 which Big Rivers evaluated the possible need for a change in its base fuel costs.^{1,2,3} 11 The current review is the fourth such review since July 2009. For the current 12 review, Big Rivers performed an analysis of its monthly FAC factor similar to the 13 analysis performed in Case Nos. 2010-00495, 2012-00555, and 2014-00455.

14In Case No. 2010-00495, Big Rivers determined that its actual15monthly FAC factor during the period under review therein was averaging over16\$0.010000 / kWh above its then-existing base fuel cost. Therefore, Big Rivers17proposed to revise its base fuel cost to \$0.020932 / kWh and to transfer \$0.010212 /

Case No. 2017-00006 Response to PSC 1-1 Witnesses: Mark W. McAdams and Roger D. Hickman Page 1 of 3

¹ See In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from July 17, 2009 through October 31, 2010, Case No. 2010-00495.

² See In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2010 through October 31, 2012. Case No. 2012-00555.

³ See In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2012 through October 31, 2014. Case No. 2014-00455.

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

kWh of fuel costs to its then-current base rates. In its Order dated May 31, 2011,
 the Commission approved Big Rivers' proposal.

3 In Case No. 2012-00555, Big Rivers determined that its actual monthly FAC factor during the period under review therein was about \$0.002000-4 \$0.005000 / kWh above its then-existing base fuel costs. At the time of the initial 5 Commission Order in that case, Big Rivers had filed a complete revised tariff in a 6 general rate proceeding³ and anticipated doing the same in another forthcoming 7 general rate proceeding.⁴ Therefore, Big Rivers proposed no change in its base 8 fuel costs. In its Order dated May 17, 2013, the Commission accepted Big Rivers' 9 proposal and confirmed the continued use, by Big Rivers, of a base fuel cost of 10 11 \$0.020932 / kWh.

12 In Case No. 2014-00455, Big Rivers analysis was impacted by the departure from Big Rivers' system of the Century-Hawesville Smelter in August 13 2013, and the departure of the Century-Sebree Smelter in January 2014. This 14 analysis for the six months ending October 31, 2014 – a period when the impact of 15 the smelter departures had worked through its FAC – showed an average actual 16 FAC factor that was \$0.002935 / kWh higher than Big Rivers' tariffed base fuel 17 cost of \$0.020932. Because of this result, and coupled with expiring fuel contracts 18 being replaced with lower fuel contracts, Big Rivers proposed no change in its base 19

Case No. 2017-00006 Response to PSC 1-1 Witnesses: Mark W. McAdams and Roger D. Hickman Page 2 of 3

³ See In the Matter of: Application of Big Rivers Electric Corporation for a General Adjustment in Rates, Case No. 2012-00535.

⁴ See In the Matter of: Application of Big Rivers Electric Corporation for a General Adjustment in Rates, Case No. 2013-00199.

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

fuel costs. In its Order dated July 27, 2015, the Commission accepted Big Rivers'
 proposal and confirmed the continued use of a base fuel cost of \$0.020932 / kWh.

During the two-year period in the current review, Big Rivers' monthly FAC factor has ranged from (\$0.000636)/kWh to \$0.004132/kWh. During the final twelve (12) months of this period the monthly factor range is from (\$0.000636)/kWh to \$0.002335/kWh, with a twelve-month average of \$0.000875.

Big Rivers' current coal delivery plan includes reclaiming existing inventory to meet generation demand and reduce overall inventory held at its generating stations to its inventory targets. In reclaiming coal inventory, the weighted-average pricing of inventory will be at a higher price, as compared to current market, rolling through Big Rivers' FAC by mid-to-year end of 2017. Big Rivers anticipates that future purchases will be at an overall lower cost than current weighted-average inventory.

14 For all of these reasons, Big Rivers is not proposing a change in its15 base fuel costs.

16

17

18 Witnesses) Mark W. McAdams and

- 19 Roger D. Hickman
- 20

Case No. 2017-00006 Response to PSC 1-1 Witnesses: Mark W. McAdams and Roger D. Hickman Page 3 of 3

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 2) Provide a calculation of the fossil fuel costs F(b) that Big
2	Rivers proposes to use to calculate the base period fuel cost. This
3	calculation shall show each component of $F(b)$ as defined by 807 KAR
4	5:056. Explain why the fuel cost in the selected base period is
5	representative of the level of fuel cost currently being experienced by Big
6	Rivers.
7	
8	Response) Not applicable. Please see Big Rivers' response to Item 1 of these
9	information requests.
10	
11	
10	With a grad with the state of t

12 Witness) Mark W. McAdams

13

Case No. 2017-00006 Response to PSC 1-2 Witness: Mark W. McAdams Page 1 of 1

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 3) Provide a schedule showing each component of sales as
2	defined by 807 KAR 5:056 in the selected base period (b). Explain why Big
3	Rivers believes that the sales in the selected base period (b) are
4	representative of the level of kWh sales that Big Rivers will derive from the
5	level of fuel cost incurred during the selected base period (b).
6	
7	Response) Not applicable. Please see Big Rivers' response to Item 1 of these
8	information requests.
9	
10	
11	Witnesses) Wayne O'Bryan and

12 Nicholas R. Castlen

13

Case No. 2017-00006 Response to PSC 1-3 Witnesses: Wayne O'Bryan and Nicholas R. Castlen Page 1 of 1

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

Item 4) Provide a schedule showing the calculation of Big Rivers'
 proposed increase or decrease in its base fuel cost per kWh to be
 incorporated into its base rate.

4

5 Response) Not applicable. Please see Big Rivers' response to Item 1 of these
6 information requests.
7

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- 8 9

Witness) Nicholas R. Castlen

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Case No. 2017-00006 Response to PSC 1-4 Witness: Nicholas R. Castlen Page 1 of 1

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

- 1 Item 5) Provide Big Rivers' most recent projected fuel requirements for 2
- the years 2017 and 2018 in tons for coal, MMBtu for natural gas and
- 3 dollars.
- 4

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

6

	<u>2017</u> ⁵	<u>2018</u> ⁵
Solid Fuel (tons)		
Natural Gas (MCF)		
Fuel Oil (Gallons)		
_	<u>2017</u>	<u>2018</u>
Solid Fuel		
Natural Gas		
Fuel Oil		
Total		

8 Witnesses) Mark W. McAdams (Coal) and

9 Wayne O'Bryan (Natural Gas)

10

7

Case No. 2017-00006 **Response to PSC 1-5** Witnesses: Mark W. McAdams (Coal) and Wayne O'Bryan (Natural Gas) Page 1 of 1

⁵ Assumes Coleman and Reid Plants remain idled.

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

- Item 6) Provide Big Rivers' most recent sales projections for the years
 2 2017 and 2018 in kWh and dollars.
- 3
- 4 **Response)** Sales projections for the years 2017 and 2018 are provided in the 5 table below.
- 6

	Year	Member Cooperative Energy (kWh)	Member Cooperative Sales (\$)	Off-System Sales ⁶ (kWh)	Off-System Sales ⁶ (\$)
	2017	3,304,767,000	264,054,289		
	2018	3,389,296,000	264,618,972		
7					
8					
9	Witness) Way	ne O'Bryan			

10

⁶ Excludes sales associated with back-to-back purchases executed as part of an off-system sales hedging strategy. These sales and the associated purchases are detailed in Big Rivers' responses to Item 11 of these information requests.

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 7)	Provide separately the amounts of power purchases used in
2	the calcula	tion of sales provided in response to Item 3.
3		
4	Response)	Not applicable. Please see Big Rivers' response to Item 1 of these
5	information	requests.
6		·
7		
8	Witness)	Nicholas R. Castlen
9		

Case No. 2017-00006 Response to PSC 1-7 Witness: Nicholas R. Castlen Page 1 of 1

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 8)	Provide separately the amounts of intersystem power sales
2	used in the	e calculation of sales provided in response to Item 3.
3		
4	Response)	Not applicable. Please see Big Rivers' response to Item 3 of these
5	information	requests.
6		
7		
8	Witness)	Nicholas R. Castlen
9		

Case No. 2017-00006 Response to PSC 1-8 Witness: Nicholas R. Castlen Page 1 of 1

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

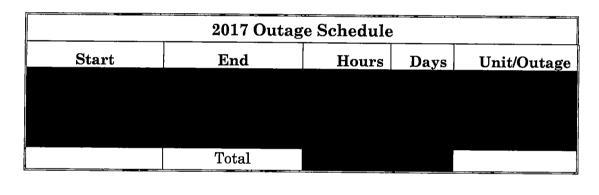
February 20, 2017

Item 9) Provide the planned maintenance schedule for each of Big Rivers' generating units for the years 2017 and 2018.

3

Response) Please see the redacted schedules below for the planned maintenance
schedule for Big Rivers' generating units for the years 2017 and 2018. The
unredacted schedule is being provided with a Petition for Confidential Treatment.

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	2018 Outa	ge Schedule		
Start	End	Hours	Days	Unit/Outage
	Total			

10 11

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Case No. 2017-00006 Response to PSC 1-9 Witness: Jason C. Burden Page 1 of 1

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 10)	For the years ending October 31, 2015, and October 31, 2016,
2	provide:	
3		
4		a. Maximum annual system demand; and
5		b. Average annual demand.
6		
7	Response)	
8		a. November 1, 2014 through October 31, 2015 – 786 MWs;
9		November 1, 2015 through October 31, 2016 – 713 MWs.
10		b. November 1, 2014 through October 31, 2015 – 456 MWs;
11		November 1, 2015 through October 31, 2016 – 435 MWs.
12		
13		
14	Witness)	Wayne O'Bryan
5		

Case No. 2017-00006 Response to PSC 1-10 Witness: Wayne O'Bryan Page 1 of 1

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 Item 11) List all firm power commitments for Big Rivers from May 1, 2 2016, through October 31, 2016, and for the years 2017 and 2018 for (a) 3 purchases and (b) sales. This list shall identify the other party (buyer or 4 seller), the amount of commitment in MW, and the purpose of the 5 commitment (e.g., peaking, emergency).

7 **Response**)

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(a) <u>Purchases</u>:

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 May 1, 2016, through October 31, 2016. For the period under review, Big Rivers has operated under an annual contract in which we have to schedule the purchases under the terms of weekly capacity declarations. These are limited to 154 MWs due to ongoing repairs on the Center Hill dam. The repairs currently are expected to last until late in 2018.

Additional purchases are shown on the table which follows. Please note, the purchases listed were made to support firm Off-System Sales and were not passed through Big Rivers' FAC.

22 23

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Case No. 2017-00006 Response to PSC 1-11 Witness: Wayne O'Bryan Page 1 of 9

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

(a) <u>Purchases (continued)</u>:

Big Rivers Electric Corporation Power Purchases May 1, 2016, through October 31, 2016												
Date Electric Utility MW Commitment Purpose												
		·	- -									
May	MISO	50 MWs – On Peak	Purchases for									
2016		16,800 Total	Off-System Sales									
May	MISO	50 MWs – Off Peak	Purchases for									
2016		20,400 Total	Off-System Sales									
May	MISO	100 MWs – On Peak	Purchases for									
2016		33,600 Total	Off-System Sales									
May	MISO	100 MWs – Off Peak	Purchases for									
2016		40,800 Total	Off-System Sales									
May	MISO	50 MWs – On Peak	Purchases for									
2016		16,800 Total	Off-System Sales									
May	MISO	50 MWs – Off Peak	Purchases for									
2016		20,400 Total	Off-System Sales									
Jul – Aug	MISO	150 MWs – On Peak	Purchases for									
2016		103,200 Total	Off-System Sales									
Jul – Aug	MISO	50 MWs – On Peak	Purchases for									
2016		34,400 Total	Off-System Sales									
Jul – Aug	MISO	100 MWs – On Peak	Purchases for									
2016		25,600 Total	Off-System Sales									
September	MISO	200 MWs – On Peak	Purchases for									
2016		67,200 Total	Off-System Sales									

Case No. 2017-00006 Response to PSC 1-11 Witness: Wayne O'Bryan Page 2 of 9

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AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

2 (b) <u>Sales</u> :	
3 Firm Off-System Sales are shown on the tables beginning or	ı the
4 following pages.	
5	
6	

Case No. 2017-00006 Response to PSC 1-11 Witness: Wayne O'Bryan Page 3 of 9

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

(b) <u>Sales (continued)</u>:

Big Rivers Electric Corporation Firm Off-System Sales May 1, 2016, through October 31, 2016									
Date	Electric Utility	MW Commitment	Purpose						
May 2016	NextEra	50 MWs – On Peak 16,800 Total	Off-System Sales						
May 2016	NextEra	50 MWs – Off Peak 20,400 Total	Off-System Sales						
May 2016	NextEra	100 MWs – On Peak 33,600 Total	Off-System Sales						
May 2016	NextEra	100 MWs – Off Peak 40,800 Total	Off-System Sales						
May 2016	NextEra	50 MWs – On Peak 16,800 Total	Off-System Sales						
May 2016	NextEra	50 MWs – Off Peak 20,400 Total	Off-System Sales						
May 2016	ADM	50 MWs – On Peak 16,800 Total	Off-System Sales						
June 2016	ADM	50 MWs – On Peak 17,600 Total	Off-System Sales						
June 2016	ADM	100 MWs – On Peak 35,200 Total	Off-System Sales						

Case No. 2017-00006 **Response to PSC 1-11** Witness: Wayne O'Bryan Page 4 of 9

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AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

(b) <u>Sales (continued)</u>:

Big Rivers Electric Corporation Firm Off-System Sales May 1, 2016, through October 31, 2016												
Date Electric Utility MW Commitment Purpose												
Jul – Aug 2016	Morgan Stanley	150 MWs – On Peak 103,200 Total	Off-System Sales									
Jul – Aug 2016	Cargill	50 MWs – On Peak 34,400 Total	Off-System Sales									
Jul – Aug 2016	Morgan Stanley	100 MWs – On Peak 25,600 Total	Off-System Sales – 100 MW call option									
Jul – Aug 2016	ADM	50 MWs – On Peak 34,400 Total	Off-System Sales									
Jul – Aug 2016	ADM	Off-System Sales										
Jul – Aug 2016	ADM	ADM 100 MWs – Off Peak 80,000 Total										
September 2016	ADM	100 MWs – On Peak 33,600 Total	Off-System Sales									
September 2016	ADM	100 MWs – Off Peak 38,400 Total	Off-System Sales									
September 2016	NextEra	200 MWs – On Peak 67,200 Total	Off-System Sales									
October 2016	ADM	25 MWs – On Peak 8,400 Total	Off-System Sales									

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1 2

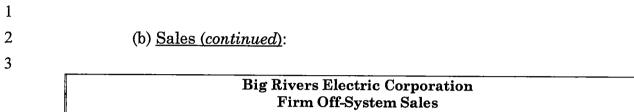
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AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017



	Fir	m Off-System Sales										
<u>May 1, 2016, through October 31, 2016</u>												
Date Electric Utility MW Commitment Purpose												

4

5 Big Rivers' firm off-system sales commitments for 2017 and for 2018 are shown on

6 table on the following pages.

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Case No. 2017-00006 Response to PSC 1-11 Witness: Wayne O'Bryan Page 6 of 9

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AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	(b) <u>Sales (continued)</u> :
2	Tables for 2017 are sales only. The physical sales represented
3	will have a corresponding back-to-back purchase that occurs
4	when the transaction executes.
5	

	Firm Off-S	ers Electric Corporation System Sales Commitments For the Year 2017										
Date Electric Utility MW Commitment Purpose												
			×.									

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> Case No. 2017-00006 Response to PSC 1-11 Witness: Wayne O'Bryan Page 7 of 9

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

6	
5	the transaction executes.
4	will have a corresponding back-to-back purchase that occurs when
3	Tables for 2017 are sales only. The physical sales represented
2	(b) <u>Sales (continued)</u> :
1	

	Big Ri Firm Off-Syste	ivers Electric Corporation om Sales Commitments (<i>continu</i>	ued)										
	For the Year 2017												
Date	Electric Utility	MW Commitment	Purpose										
			•										

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> Case No. 2017-00006 Response to PSC 1-11 Witness: Wayne O'Bryan Page 8 of 9

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

(b) <u>Sales (continued)</u>: Tables for 2018 are sales only. The physical sales represented will have a corresponding back-to-back purchase that occurs when

the transaction executes.

	Firm Off-S	ers Electric Corporation system Sales Commitments								
For the Year 2018 Date Electric Utility MW Commitment Purpose										
rurpose										

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8 Witness) Wayne O'Bryan

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Case No. 2017-00006 Response to PSC 1-11 Witness: Wayne O'Bryan Page 9 of 9

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

Item 12) Provide a monthly billing summary for all sales to all electric
 utilities for the period May 1, 2016 through October 31, 2016.

3

4 Response) Please see the attachment to this response for monthly billing 5 summaries of sales to all electric utilities for the period May 1, 2016, through 6 October 31, 2016. Pursuant to 807 KAR 5:001 Section 4(10), related to privacy 7 protection for filings, certain information included on these schedules has been 8 redacted.

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11 Witness) Nicholas R. Castlen

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Case No. 2017-00006 Response to PSC 1-12 Witness: Nicholas R. Castlen Page 1 of 1

Big Rivers Electric Corporation Monthly Billing Summary Sales to Members May 2016

1 2	MAY 2016	KW BILLED	KWH		DEMAND \$		BASE ENERGY \$	DI	EMAND \$ AND ENERGY \$) P	POWER FACTOR ENALTY (PFP) \$]	BILLING ADJ		DEMAND \$ ENERGY \$ AND PFP \$
3	JP RURALS	107,980	44,921,110	\$	1,490,663.90	\$	2.021.449.95	\$	3,512,113.85					¢	3,512,113.85
4	KENERGY RURALS	192,157	80,825,900	\$	2,652,727.39	\$	3,637,165.50	ŝ	6,289,892.89					φ ¢	6,289,892,89
5 6	MEADE CO. RURALS	68,632	30,614,113	\$	947,464.76	\$	1,377,635.09	\$	2,325,099.85					գ \$	2,325,099.85
7 8	TOTAL RURALS	368,769	156,361,123	\$	5,090,856.05	\$	7,036,250.54	\$	12,127,106.59	\$		\$	-	\$	12,127,106.59
9		5,292	2,267,040	\$	56,703,78	\$	86,260.87	 \$	142,964.65	 \$		e		 \$	149.004.05
10		63	35,150	\$	675.05	ŝ	1,337.46	Ś	2,012,51	Ψ \$	535.75	φ	•	φ o	142,964.65 2,548.26
11		26,422	15,072,850	Ś	283,111,73	\$	573,521.94	ŝ	856,633.67	Ψ	000.10	φ e	-	φ n	
12		1,752	552,700	ŝ	18,772.68	\$	21,030.24	φ S	39,802.92	φ	-	ф С	-	ቅ	856,633.67
13		10,074	3,866,410	Ŝ	107,942.91	ŝ	147.116.90	\$	255,059.81	φ	•	φ ¢	13,810.33	ծ Տ	39,802.92 268,870,14
14		2,760	800,430	Ŝ	29,573.40	ŝ	30,456.36	ŝ	60,029.76	ę	-	φ	2,051.01	Տ	208,870,14 62,080,77
15		1,000	305,530	ŝ	10,715.00	ŝ	11,625.42	ŝ	22,340.42	φ	-	φ ¢	2,051.01 582.37	ወ ወ	62,080.77 22,922.79
16		3,342	592,060	\$	35,809.53	ŝ	22,527.88	ŝ	58,337.41	ŝ	407.17	φ ¢	002.07	ф ¢	58,744.58
17		15,000	10,974,498	\$	160,725.00	ŝ	417,579.65	ŝ	578,304.65	Ψ \$		φ ¢	-	φ ¢	578,304,65
18		60	10,550	\$	642.90	ŝ	401.43	ŝ	1,044.33	Ś	_	φ	-	φ ¢	1,044.33
19		750	543,080	\$	8,036.25	ŝ	20,664.19	ŝ	28,700.44	ŝ	300.02	φ	-	φ ¢	29,000.46
20		100	24,230	\$	1.071.50	Ŝ	921.95	ŝ	1,993.45	ŝ		ŝ		φ	1,993.45
21		36,763	21,892,720	\$	393,915.55	Ś	833,018.00	ŝ	1,226,933,55	ŝ	-	φ		φ	1,553.45
22		4,397	1,901,400	\$	47,113.86	ŝ	72,348.27	ŝ	119,462.13	ŝ	5,893.25	φ		φ ¢	125,355.38
23		3,478	1,653,250	\$	37,266.77	ŝ	62,906.16	ŝ	100,172,93	ŝ	0,000.40	φ	-	φ ¢	125,555.58
24		100	39,930	\$	1,071,50	ŝ	1,519.34	ŝ	2,590.84	ŝ	-	φ ¢	_	ę	2,590.84
25		500	106,400	\$	5,357.50	\$	4,048.52	ŝ	9,406.02	ŝ	_	φ	-	φ ¢	9,406.02
26		7,197	4,446,270	\$	77,115.86	\$	169,180.57	ŝ	246,296,43	ŝ	-	ŝ	_	φ	246,296.43
27		11,826	6,271,090	\$	126,715.59	ŝ	238,614.97	ŝ	365,330.56	ŝ	-	ŝ	-	\$	365,330,56
28 29		2,071	1,220,930	\$	22,190.77	\$	46,456.39	\$	68,647.16	\$	3,085.92	\$	-	\$	71,733.08
30 31	SUBTOTAL INDUSTRIALS	132,947	72,576,518	\$	1,424,527.13	\$	2,761,536.51	\$	4,186,063.64	\$	10,222.11	\$	16,443.71	\$	4,212,729.46
32 33		3,218	700,040	\$	34,480.87	\$	26,636.52	\$	61,117.39	\$	-	\$	-	\$	61,117.39
34 35	TOTAL INDUSTRIALS	136,165	73,276,558	\$	1,459,008.00	\$	2,788,173.03	\$	4,247,181.03	\$	10,222.11	\$	16,443.71	\$	4,273,846.85
36 37	GRAND TOTAL	504,934	229,637,681	\$	6,549,864.05	\$	9,824,423.57	\$	16,374,287.62	\$	10,222.11	\$	16,443.71	\$	16,400,953.44

Case No. 2017-00006 Attachment for Response to PSC 1-12 Witness: Nicholas R. Castlen Page 1 of 24

Big Rivers Electric Corporation Monthly Billing Summary Sales to Members May 2016

1 2	MAY 2016		GREEN POWER \$		DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$		FUEL DJUSTMENT CLAUSE \$	FAC MILLS/ KWH	ES \$	ES MILLS/ KWH	NON SMELTER NON FAC PPA		NSNFPPA MILLS/ KWH
3	JP RURALS	\$	5.00	\$	3,512,118.85	\$	(6,558,48)	(0.15)	\$ 264.612.27	5.89	e	45,325.40	1.01
4	KENERGY RURALS	\$	-	\$	6,289,892.89	\$	(11,800.58)	(0.15)	\$ 470,408.12	5.82	φ \$	45,525.40 81,553.33	1.01
5 6	MEADE CO. RURALS	\$	-	\$	2,325,099.85	\$	(4,469.66)	(0.15)	\$ 171,691.28	5.61	φ \$	30,889.64	1.01
7	TOTAL RURALS	\$	5.00	\$	12,127,111.59	\$	(22,828.72)	(0.15)	\$ 906,711.67	5.80	\$	157,768.37	1.01
9				\$	142,964.65	\$	(330.99)	(0.15)	 \$ 11,985.11	5.29	 \$	2,287.44	 1.01
10				\$	2,548.26	\$	(5.13)	(0.15)	\$ 168.95	4.81	\$	35.47	1.01
11				\$	856,633.67	\$	(2,200.64)	(0.15)	\$ 71,920.15	4.77	ŝ	15,208.51	1.01
12				\$	39,802.92	\$	(80.69)	(0.15)	\$ 3,331.18	6.03	ŝ	557.67	1.01
13				\$	268,870.14	\$	(564.50)	(0.15)	\$ 21,369.63	5.53	\$	3,901.21	1.01
14				\$	62,080.77	\$	(116.86)	(0.15)	\$ 5,021.64	6.27	\$	807.63	1.01
15				\$	22,922.79	\$	(44.61)	(0.15)	\$ 1,869.38	6.12	ŝ	308.28	1.01
16				\$	58,744.58	\$	(86.44)	(0.15)	\$ 4,866.81	8.22	ŝ	597.39	1.01
17				\$	578,304.65	\$	(1,602.28)	(0.15)	\$ 48,609.58	4.43	\$	11,073.27	1.01
18 19				\$	1,044.33	\$	(1.54)	(0.15)	\$ 87.12	8.26	\$	10.64	1.01
				\$	29,000.46	\$	(79.29)	(0.15)	\$ 2,412.31	4.44	\$	547.97	1.01
20 21				\$	1,993.45	\$	(3.54)	(0.15)	\$ 166.59	6.88	\$	24.45	1.01
21				\$	1,226,933.55	\$	(3,196.34)	(0.15)	\$ 103,031.02	4.71	\$	22,089.75	1.01
22				\$	125,355.38	\$	(277.60)	(0.15)	\$ 10,015.33	5.27	\$	1,918.51	1.01
23 24				\$	100,172.93	\$	(241.37)	(0.15)	\$ 8,402.39	5.08	\$	1,668.13	1.01
24 25				\$	2,590.84	\$	(5.83)	(0.15)	\$ 217.11	5.44	\$	40.29	1.01
				\$	9,406.02	\$	(15.53)	(0.15)	\$ 785.48	7.38	\$	107.36	1.01
26 27				\$	246,296.43	\$	(649.16)	(0.15)	\$ 20,686.27	4.65	\$	4,486.29	1.01
27				\$	365,330.56	\$	(915.58)	(0.15)	\$ 30,660.74	4.89	\$	6,327.53	1.01
28 29				\$ 	71,733.08	\$	(178.26)	(0.15)	\$ 5,764.32	4.72	\$	1,231.92	1.01
30 31 32 33 34 35 36 37	SUBTOTAL INDUSTRIALS	\$	-	\$	4,212,729.46	\$	(10,596.18)	(0.15)	\$ 351,371.11	4.84	\$	73,229.71	1.01
				\$	61,117.39	\$	(102.21)	(0.15)	\$ 5,104.43	7.29	\$	706.34	1.01
	TOTAL INDUSTRIALS	\$	-	\$	4,273,846.85	\$	(10,698.39)	(0.15)	\$ 356,475.54	4.86	\$	73,936.05	1.01
	GRAND TOTAL	\$	5.00	\$	16,400,958.44	\$	(33,527.11)	(0.15)	\$ 1,263,187.21	5.50		281,704.42	1.01

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.

Big Rivers Electric Corporation Monthly Billing Summary Sales to Members May 2016

1 2	MAY 2016		REVENUE \$	REVENUE MILLS/ KWH		MRSM \$	MRSM MILLS/ KWH	M	EN 2013-00199 RSM TO OFF- SET BASE RATE INCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	N	REVENUE \$ ET OF MRSM \$ AND BASE ATE CREDIT \$	REV NET OF MRSM AND BASE RATE CREDIT MILLS/KWH
3	JP RURALS	\$	3,815,498.04	84.94	\$	(214,436,51)	(4.77)	 \$	(351,251.30)				
4	KENERGY RURALS	\$	6,830,053.76	84.50	\$	(406,479.00)	(5.03)	φ \$	(671,581.07)	(7.82)	\$	3,249,810.23	72.34
5	MEADE CO. RURALS	\$	2,523,211.11	82.42	\$	(159,321.81)	(5.20)	\$	(275,469.18)	(8.31) (9.00)	\$	5,751,993.69	71.17
6							. ,		(270,409.10)		\$	2,088,420.12	68.22
7 8	TOTAL RURALS	\$	13,168,762.91		\$	(780,237.32)	(4.99)		(1,298,301.55)	(8.30)	\$	11,090,224.04	70.93
9 10		\$	156,906.21	69.21	\$	(1,866.78)	(0.82)	 \$		0.00	 \$	155.039.43	68.39
11		\$	2,747.55	78.17	\$	(26.75)	(0.76)	\$	-	0.00	\$	2,720.80	77.41
12		\$	941,561.69	62.47	\$	(11,405.09)	(0.76)	\$	•	0.00	\$	930,156.60	61.71
13		\$	43,611.08	78.91	\$	(508.16)	(0.92)	\$	-	0.00	\$	43,102.92	77.99
14		\$	293,576.48	75.93	\$	(3,304.21)	(0.85)	\$	-	0.00	\$	290,272.27	75.08
14		\$	67,793.18	84.70	\$	(761.51)	(0.95)	\$	-	0.00	\$	67,031.67	83.74
16		\$	25,055.84	82.01	\$	(284.52)	(0.93)	\$	-	0.00	\$	24,771.32	81.08
10		\$	64,122.34	108.30	\$	(712.65)	(1.20)	\$	-	0.00	\$	63,409.69	107.10
18		\$	636,385.22	57.99	\$	(7,817.25)	(0.71)	\$	•	0.00	\$	628,567.97	57.28
19		\$	1,140.55	108.11	\$	(12.75)	(1.21)	\$	-	0.00	\$	1,127.80	106.90
20		\$ •	31,881.45	58.70	\$	(387.72)	(0.71)	\$	-	0.00	\$	31,493.73	57.99
20		\$	2,180.95	90.01	\$	(24.94)	(1.03)	\$	-	0.00	\$	2,156.01	88.98
22		\$	1,348,857.98	61.61	\$	(16,380.06)	(0.75)	\$	-	0.00	\$	1,332,477.92	60.86
23		\$	137,011.62	72.06	\$	(1,560.93)	(0.82)	\$	-	0.00	\$	135,450.69	71.24
24		\$	110,002.08	66.54	\$	(1,317.57)	(0.80)	\$	-	0.00	\$	108,684.51	65.74
25		\$	2,842.41	71.18	\$	(33.66)	(0.84)	\$	-	0.00	\$	2,808.75	70.34
26		\$	10,283.33	96.65	\$	(116.51)	(1.10)	\$	-	0.00	\$	10,166.82	95.55
20		\$	270,819.83	60.91	\$	(3,295.75)	(0.74)	\$	-	0.00	\$	267,524.08	60.17
28		\$	401,403.25	64.01	\$	(4,840.80)	(0.77)	\$	-	0.00	\$	396,562.45	63.24
29		 \$	78,551.06	64.34	\$ 	(915.88)	(0.75)	\$	-	0.00	\$	77,635.18	63.59
30 31	SUBTOTAL INDUSTRIALS	\$	4,626,734.10	63.75	\$	(55,573.49)	(0.77)	\$	-	0.00	\$	4,571,160.61	62.98
32 33		\$	66,825.95	95.46	\$	(758.37)	(1.08)	\$	-	0.00	\$	66,067.58	94.38
34 35	TOTAL INDUSTRIALS	\$	4,693,560.05	64.05	\$	(56,331.86)	(0.77)	\$	-	0.00	\$	4,637,228.19	63.28
36 37	GRAND TOTAL	\$ ===	17,862,322.96	77.78	\$ ====	(836,569.18)	(3.64)	\$	(1,298,301.55)	(5.65)	\$	15,727,452.23	68.49

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members June 2016

1 2	JUNE 2016	KW BILLED	KWH		DEMAND \$		BASE ENERGY \$	D	EMAND \$ AND ENERGY \$) F	POWER FACTOR 'ENALTY (PFP) \$	BILLING ADJ		DEMAND \$ ENERGY \$ AND PFP \$
3	JP RURALS	144,530	63,215,360	\$	1,995,236.65	\$	2.844.691.20	\$	4,839,927.85			 ******	•	4 000 007 07
4	KENERGY RURALS	247,260	111,330,107	Ŝ	3,413,424.30	\$	5,009,854.82	ŝ	8,423,279.12				ф Ф	4,839,927.85
5 6	MEADE CO. RURALS	90,274	39,867,070	\$	1,246,232.57	\$	1,794,018.15	\$	3,040,250.72				ծ \$	8,423,279.12 3,040,250.72
7 8	TOTAL RURALS	482,064	214,412,537	\$	6,654,893.52	\$	9,648,564.17	\$	16,303,457.69	\$		\$ -	\$	16,303,457.69
9		5,405	2,482,360	 S	57,914.58	 @	94,453.80	 D	150.000.00			 	•••••	
10		55	32,560	Ψ \$	589.33	φ \$	94,455.80 1,238.91	Þ ø	152,368.38	\$	-	\$ -	\$	152,368.38
11		26,156	14,109,180	φ	280,261.54	φ \$	•	\$	1,828.24	\$	921.49	\$ -	\$	2,749.73
12		1,741	555,020	φ \$	18,654.82	ծ Տ	536,854.30	\$	817,115.84	\$	-	\$ -	\$	817,115.84
13		9,973	3,554,940	φ \$	106,860.70	ծ Տ	21,118.51	\$	39,773.33	\$	428.60	\$ •	\$	40,201.93
14		2,760	767,546	φ \$	29,573.40	ф \$	135,265.47	\$	242,126.17	\$	1,200.08	\$ 14,848.40	\$	258,174.65
15		1,000	295,840	φ ¢	10,715.00	φ ¢	29,205.13	\$	58,778.53	\$	-	\$ 1,666.77	\$	60,445.30
16		3,295	560,460	φ \$	35,305.93	ቅ	11,256.71	\$	21,971.71	\$	-	\$ 805.05	\$	22,776.76
17		15,000	10,795,747	ф \$	160.725.00	ቅ	21,325.50	\$	56,631.43	\$	-	\$ -	\$	56,631.43
18		60	10,730,747	φ \$	642.90	ቅ	410,778.17	\$	571,503.17	\$	-	\$ -	\$	571,503.17
19		750	382,350	φ \$		¢ n	484.38	\$	1,127.28	\$	-	\$ -	\$	1,127.28
20		100	22,650	φ Φ	8,036.25	¢ ¢	14,548.42	\$	22,584.67	\$	321.45	\$ -	\$	22,906.12
21		37,238	22,650 24,999,950	ቅ	1,071.50	\$	861.83	\$	1,933.33	\$	-	\$ -	\$	1,933.33
22		4,407		ф Ф	399,005.17	\$	951,248.10	\$	1,350,253.27	\$	-	\$ -	\$	1,350,253.27
23		3,538	1,812,950	ð	47,221.01	\$	68,982.75	\$	116,203.76	\$	5,903.97	\$ -	\$	122,107.73
24		100	1,833,590	ð	37,909.67	\$	69,768.10	\$	107,677.77	\$	-	\$ -	\$	107,677.77
25		500	28,190	\$	1,071.50	\$	1,072.63	\$	2,144.13	\$	-	\$ -	\$	2,144.13
26		7,326	102,420	\$	5,357.50	\$	3,897.08	\$	9,254.58	\$	-	\$ -	\$	9,254.58
27		-	4,332,980	\$	78,498.09	\$	164,869.89	\$	243,367.98	\$	-	\$ -	\$	243,367.98
28		12,740	6,786,840	\$	136,509.10	\$	258,239.26	\$	394,748.36	\$	-	\$ -	\$	394,748.36
29		1,987 .	1,247,690	\$	21,290.71	\$ 	47,474.60	\$	68,765.31	\$	3,589.53	\$ -	\$	72,354.84
30 31	SUBTOTAL INDUSTRIALS	134,131	74,715,993	\$	1,437,213.70	\$	2,842,943.54	\$	4,280,157.24	\$	12,365.12	\$ 17,320.22	\$	4,309,842.58
32 33		1,836	557,740	\$	19,672.74	\$	21,222.01	\$	40,894.75	\$	-	\$ -	\$	40,894.75
34 35	TOTAL INDUSTRIALS	135,967	75,273,733	\$	1,456,886.44	\$	2,864,165.55	\$	4,321,051.99	\$	12,365.12	\$ 17,320.22	\$	4,350,737.33
36 37	GRAND TOTAL	618,031	289,686,270	\$ 	8,111,779.96	\$	12,512,729.72	\$	20,624,509.68	\$	12,365.12	\$ 17,320.22	\$	20,654,195.02

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members June 2016

1 2	JUNE 2016	P	REEN OWER \$	EI \$	DEMAND \$ NERGY \$ PFP AND GREEN POWER \$	A	FUEL ADJUSTMENT CLAUSE \$	FAC MILLS/ KWH		ES \$	ES MILLS/ KWH		NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
3	JP RURALS	\$	5.00	\$	4,839,932,85	\$	(40,204,97)	(0.64)	\$	363,164.24	5.74	 ሙ		
4	KENERGY RURALS	\$	-	\$	8,423,279.12	\$	(70,805.95)	(0.64)	\$	623,690,37	5.60	¢ ¢	63,784.30 112,332.08	1.01
5 6	MEADE CO. RURALS	\$	-	\$	3,040,250.72	\$	(25,355.46)	(0.64)	\$	221,938.05	5.57	Ф \$	40,225.87	1.01 1.01
7 8	TOTAL RURALS	\$	5.00	\$	16,303,462.69	\$	(136,366.38)	(0.64)	\$	1,208,792.66	5.64	 \$	216,342,25	
9		•		 \$	152,368.38	-	(1,578,78)	(0.64)	 \$	12,620.35	5.08	 e		
10				\$	2,749.73	\$	(20.71)	(0.64)	ŝ	151.51	4.65	φ \$	2,504.70 32.85	1.01
11				\$	817,115.84	\$	(8,973.44)	(0.64)	ŝ	67,704.43	4.80	φ S	52.85 14,236,16	1.01
12				\$	40,201.93	\$	(352.99)	(0.64)	ŝ	3,291,49	5.93	φ S	560.02	1.01 1.01
13				\$	258,174.65	\$	(2,260.94)	(0.64)	\$	20,042,82	5.64	\$	3,586.93	1.01
14				\$	60,445.30	\$	(488.16)	(0.64)	\$	4,862.66	6.34	\$	774.45	1.01
15 16				\$	22,776.76	\$	(188.15)	(0.64)	\$	1,817.96	6.15	ŝ	298.50	1.01
10				\$	56,631.43	\$	(356.45)	(0.64)	\$	4,679.54	8.35	\$	565,50	1.01
18				\$	571,503.17	\$	(6,866.10)	(0.64)	\$	47,381.98	4.39	\$	10,892,91	1.01
19				\$	1,127.28	\$	(8.10)	(0.64)	\$	93.20	7.32	\$	12.84	1.01
20				\$	22,906.12	\$	(243.17)	(0.64)	\$	1,871.08	4.89	\$	385.79	1.01
20				\$	1,933.33	\$	(14.41)	(0.64)	\$	159.86	7.06	\$	22.85	1.01
22				\$	1,350,253.27	\$	(15,899.97)	(0.64)	\$	111,930.77	4.48	\$	25,224.95	1.01
23				ð n	122,107.73	\$	(1,153.04)	(0.64)	\$	9,622.45	5.31	\$	1,829.27	1.01
24				\$	107,677.77	\$	(1,166.16)	(0.64)	\$	8,921.16	4.87	\$	1,850.09	1.01
25				ş	2,144.13	\$	(17.93)	(0.64)	\$	177.39	6.29	\$	28.44	1.01
26				ð	9,254.58	\$	(65.14)	(0.64)	\$	765.05	7.47	\$	103.34	1.01
27				ф Ф	243,367.98	\$	(2,755.78)	(0.64)	\$	20,168.95	4.65	\$	4,371.98	1.01
28				ф Ф	394,748.36	ð	(4,316.43)	(0.64)	\$	32,707.08	4.82	\$	6,847.92	1.01
29					72,354.84	\$ 	(793.53)	(0.64)	\$	5,699.60	4.57	\$	1,258.92	1.01
30 31	SUBTOTAL INDUSTRIALS	\$	-	\$	4,309,842.58	\$	(47,519.38)	(0.64)	\$	354,669.33	4.75	\$	75,388.41	1.01
32 33				\$	40,894.75	\$	(354.72)	(0.64)	\$	3,383.89	6.07	\$	562.76	1.01
34 35	TOTAL INDUSTRIALS	\$	•	\$	4,350,737.33	\$	(47,874.10)	(0.64)	\$	358,053.22	4.76	\$	75,951.17	1.01
36 37	GRAND TOTAL	\$	5.00	\$	20,654,200.02	\$	(184,240.48)	(0.64)	\$	1,566,845.88	5.4İ		292,293.42	1.01

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members **June 2016**

1 2	JUNE 2016	F	REVENUE \$	REVENUE MILLS/ KWH		MRSM \$	MRSM MILLS/ KWH	М	CN 2013-00199 RSM TO OFF- SET BASE RATE INCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	N	REVENUE \$ ET OF MRSM \$ AND BASE ATE CREDIT \$	REV NET OF MRSM AND BASE RATE CREDIT MILLS/KWH
3	JP RURALS	\$	5,226,676,42	82.68	\$	(256,429,69)	(4.06)		(150 000 00)				
4	KENERGY RURALS	\$	9,088,495.62	81.64	\$	(494,411.49)	(4.44)	ֆ Տ	(452,296.69)	(7.15)	\$	4,517,950.04	71.47
5	MEADE CO. RURALS	\$	3,277,059,18	82.20	\$	(195,509.59)	(4.44) (4.90)	ې ۵	(889,088.27)	(7.99)	\$	7,704,995.86	69.21
6					Ψ 	(130,009.09)	(4.90)	Þ	(359,328.62)	(9.01)	\$	2,722,220.97	68.28
7 8	TOTAL RURALS	\$	17,592,231.22	82.05	\$	(946,350.77)	(4.41)	\$	(1,700,713.58)	(7.93)	 \$	14,945,166.87	69.70
9		\$	165,914.65	66.84	\$	(2,367.08)	(0.95)	• e		• • • • • • • • • • • • • • • • • • • •			
10		\$	2,913.38	89.48	\$	(28.68)	(0.88)	φ \$	-	0.00	\$	163,547.57	65.88
11		\$	890,082,99	63.09	\$	(12,775.54)	(0.88)	φ \$	-	0.00	\$	2,884.70	88.60
12		\$	43,700.45	78.74	\$	(608.38)	(1.10)	φ \$	•	0.00	\$	877,307.45	62.18
13		\$	279,543.46	78.64	ŝ	(3,721.66)	(1.10)	ф Ф	-	0.00	\$	43,092.07	77.64
14		\$	65.594.25	85.46	š	(893.72)	(1.05)	ф р	-	0.00	\$	275,821.80	77.59
15		\$	24,705.07	83.51	ŝ	(334.98)	(1.13)	ው ው	•	0.00	\$	64,700.53	84.30
16		\$	61,520.02	109.77	ŝ	(842.77)	(1.13)	ዋ ድ	-	0.00	\$	24,370.09	82.38
17		\$	622,911.96	57.70	ŝ	(9,030.22)	(0.84)	ф Ф	-	0.00	\$	60,677.25	108.26
18		\$	1,225,22	96.25	ŝ	(16.93)	(0.84)	ቅ	-	0.00	\$	613,881.74	56.86
19		\$	24,919.82	65.18	ŝ	(352.33)	(0.92)	Տ	-	0.00	\$	1,208.29	94.92
20		\$	2,101.63	92.79	ŝ	(29.12)	(0.92) (1.29)	¢ ¢	-	0.00	\$	24,567.49	64.25
21		ŝ	1,471,509.02	58.86	s ε	(21,283.34)	(0.85)	\$	•	0.00	\$	2,072.51	91.50
22		ŝ	132,406.41	73.03	φ ¢	(1,797.06)	· · · · · · · · · · · · · · · · · · ·	ş	-	0.00	\$	1,450,225.68	58.01
23		ŝ	117,282.86	63.96	φ ¢	(1,797.08)	(0.99)	\$	-	0.00	\$	130,609.35	72.04
24		ŝ	2,332.03	82.73	ወ		(0.92)	\$	•	0.00	\$	115,601.95	63.05
25		\$	10,057,83	98.20	ф n	(32.62)	(1.16)	\$	-	0.00	\$	2,299.41	81.57
26		\$	265,153.13		ф п	(138.82)	(1.36)	\$	-	0.00	\$	9,919.01	96.85
27	·	φ \$	429.986.93	61.19	þ	(3,818.40)	(0.88)	\$	-	0.00	\$	261,334.73	60.31
28		Ψ Q	78,519.83	63.36	\$	(6,168.87)	(0.91)	\$	•	0.00	\$	423,818.06	62.45
29		Ψ		62.93	\$ 	(1,081.31)	(0.87)	\$	-	0.00	\$	77,438.52	62.07
30 31	SUBTOTAL INDUSTRIALS	\$	4,692,380.94	62.80	\$	(67,002.74)	(0.90)	\$	•	0.00	\$	4,625,378.20	61.91
32 33		\$	44,486.68	79.76	\$	(624.21)	(1.12)	\$	-	0.00	\$	43,862.47	78.64
34 35	TOTAL INDUSTRIALS	\$	4,736,867.62	62.93	\$	(67,626.95)	(0.90)	\$	-	0.00	\$	4,669,240.67	62.03
36 37	GRAND TOTAL	\$2 ===	22,329,098.84	77.08	\$	(1,013,977.72)	(3.50)	\$	(1,700,713.58)	(5.87)	\$	19,614,407.54	67.71

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members July 2016

1

DOMED

1	JULY 2016	KW BILLED	KWH		DEMAND \$		BASE ENERGY \$	D	EMAND \$ AND ENERGY \$) F	POWER FACTOR 'ENALTY (PFP) \$	J	BILLING ADJ		DEMAND \$ ENERGY \$ AND PFP \$
3	JP RURALS	144,425	68,675,170	\$	1,993,787,13	\$	3,090,382,65	8	5.084.169.78			•		 e	5,084,169.78
4	KENERGY RURALS	252,124	119,168,647	\$	3,480,571.82	ŝ	5,362,589.12	ŝ	8,843,160.94					ф ¢	8,843,160.94
5	MEADE CO. RURALS	90,401	43,809,994	\$	1,247,985.81	\$	1,971,449.73	\$	3,219,435.54					φ \$	3,219,435.54
67	TOTAL RURALS	486,950	231,653,811	\$	6,722,344.76	\$	10,424,421.50	\$	17,146,766.26	 \$	 -	• •••••		 \$	17,146,766.26
8 9		5,458	2,393,140	 \$	58,482.47	••••	01.050.00								
10		55	2,353,140	Ф \$	589.33	¢	91,058.98	\$	149,541.45	\$		\$	-	\$	149,541.45
11		27,069	15,196,980			\$	1,251.85	\$	1,841.18	\$	803.63	\$	-	\$	2,644.81
12		1,678	511,840	ዋ ድ	290,044.34	\$	578,245.09	\$	868,289.43	\$		\$	-	\$	868,289.43
13		9,652		ф Ф	17,979.77	\$	19,475.51	\$	37,455.28	\$	1,285.80	\$	-	\$	38,741.08
14		-	3,733,820	\$	103,421.18	\$	142,071.85	\$	245,493.03	\$	1,157.22	\$	15,446.49	\$	262,096.74
15		2,760	790,090	\$	29,573.40	\$	30,062.92	\$	59,636.32	\$	-	\$	2,174.43	\$	61,810.75
16		1,000	316,030	\$	10,715.00	\$	12,024.94	\$	22,739.94	\$	-	\$	747.95	\$	23,487.89
17		3,462	507,050	\$	37,095.33	\$	19,293.25	\$	56,388.58	\$	-	\$	-	\$	56,388.58
		15,000	11,144,899	\$	160,725.00	\$	424,063.41	\$	584,788.41	\$	-	\$	-	\$	584,788.41
18		60	14,270	\$	642.90	\$	542.97	\$	1,185.87	\$	-	\$	-	\$	1,185.87
19		750	0	\$	8,036.25	\$	-	\$	8,036.25	\$	-	\$	-	\$	8,036.25
20		100	25,060	\$	1,071.50	\$	953.53	\$	2,025.03	\$	-	\$	-	\$	2,025.03
21		37,368	26,108,000	\$	400,398.12	\$	993,409.40	\$	1,393,807.52	\$	-	\$	-	\$	1,393,807.52
22		4,281	1,509,720	\$	45,870.92	\$	57,444.85	\$	103,315.77	\$	7,061.19	\$	-	ŝ	110.376.96
23		3,599	1,576,800	\$	38,563.29	\$	59,997.24	\$	98,560.53	\$	-	ŝ	-	ŝ	98,560.53
24		100	25,370	\$	1,071.50	\$	965.33	\$	2,036.83	ŝ	-	ŝ	_	¢	2,036.83
25		500	106,880	\$	5,357.50	\$	4,066,78	\$	9,424.28	ŝ	-	ę	_	ę	9,424.28
26		7,447	4,540,900	\$	79,794.61	ŝ	172,781.25	ŝ	252,575.86	ŝ		φ	-	φ Φ	252,575.86
27		13,102	6,462,100	\$	140,387,93	ŝ	245,882.91	ŝ	386,270.84	ę.	1,575.11	φ	-	ф ф	
28		2,249	1,187,690	ŝ	24,098.04	ŝ	45,191.60	φ	69,289.64	φ e	3,353.80	ф Ф	-	ð	387,845.95
29				•	21,000.01	Ψ	10,101.00	Ψ	03,205.04	φ	0,000.00	φ	-	ф	72,643.44
30 31	SUBTOTAL INDUSTRIALS	135,690	76,183,539	\$	1,453,918.38	\$	2,898,783.66	\$	4,352,702.04	\$	15,236.75	\$	18,368.87	\$	4,386,307.66
32 33		3,121	813,520	\$	33,441.52	\$	30,954.44	\$	64,395.96	\$	-	\$	-	\$	64,395.96
34 35		138,811	76,997,059	\$	1,487,359.90	\$	2,929,738.10	\$	4,417,098.00	\$	15,236.75	\$	18,368.87	\$	4,450,703.62
36 37		625,761	308,650,870	\$	8,209,704.66	\$	13,354,159.60	\$	21,563,864.26	\$	15,236.75	\$	18,368.87	\$	21,597,469.88

Case No. 2017-00006 Attachment for Response to PSC 1-12 Witness: Nicholas R. Castlen Page 7 of 24

Big Rivers Electric Corporation Monthly Billing Summary Sales to Members July 2016

1	JULY 2016		REEN DWER \$	Eľ	DEMAND \$ NERGY \$ PFP AND GREEN POWER \$	AI	FUEL DJUSTMENT CLAUSE \$	FAC MILLS/ KWH	ES \$	ES MILLS/ KWH		NON MELTER NON FAC PPA	NSNFPPA MILLS/ KWH
2 3	JP RURALS	\$	5.00		5,084,174,78	 \$	9,683.20	0.14	 \$ 487,297.93	7.10	 @	69,293.25	1.01
4	KENERGY RURALS	\$	-	\$	8,843,160.94	\$	16.802.78	0.14	\$ 834,216.13	7.00	φ St	120.241.16	1.01
5	MEADE CO. RURALS	\$	-	\$	3,219,435.54	\$	6,177.21	0.14	\$ 299,202.24	6.83	\$	44,204.28	1.01
7 8	TOTAL RURALS	\$	5.00	\$	17,146,771.26	\$	32,663.19	0.14	\$ 1,620,716.30	7.00	\$	233,738.69	1.01
9				\$	149,541.45	\$	337.43	0.14	\$ 15,903.05	6.65	\$	2,414.68	1.01
10				\$	2,644.81	\$	4.64	0.14	\$ 196.21	5.96	\$	33.20	1.01
11				\$	868,289.43	\$	2,142.77	0.14	\$ 92,494.93	6.09	\$	15,333.75	1.01
12				\$	38,741.08	\$	72.17	0.14	\$ 3,972.68	7.76	\$	516.45	1.01
13				\$	262,096.74	\$	526.47	0.14	\$ 26,083.67	6.99	\$	3,767.42	1.01
14				\$	61,810.75	\$	111.40	0.14	\$ 6,322.32	8.00	\$	797.20	1.01
15				\$	23,487.89	\$	44.56	0.14	\$ 2,412.54	7.63	\$	318.87	1.01
16				\$	56,388.58	\$	71.49	0.14	\$ 5,949.19	11.73	\$	511.61	1.01
17				\$	584,788.41	\$	1,571.43	0.14	\$ 62,404.11	5.60	\$	11,245.20	1.01
18				\$	1,185.87	\$	2.01	0.14	\$ 125.55	8.80	\$	14.40	1.01
19				\$	8,036.25	\$	-	0.00	\$ 839.17	0.00	\$	•	0.00
20				\$	2,025.03	\$	3.53	0.14	\$ 214.47	8.56	\$	25.29	1.01
21				\$	1,393,807.52	\$	3,681.23	0.14	\$ 148,681.73	5.69	\$	26,342.97	1.01
22				\$	110,376.96	\$	212.87	0.14	\$ 10,969.91	7.27	\$	1,523.31	1.01
23				\$	98,560.53	\$	222.33	0.14	\$ 10,481.41	6.65	\$	1,590.99	1.01
24				\$	2,036.83	\$	3.58	0.14	\$ 215.74	8.50	\$	25.60	1.01
25				\$	9,424.28	\$	15.07	0.14	\$ 996.95	9.33	\$	107.84	1.01
26				\$	252,575.86	\$	640.27	0.14	\$ 26,920.20	5.93	\$	4,581.77	1.01
27				\$	387,845.95	\$	911.16	0.14	\$ 41,111.83	6.36	\$	6,520.26	1.01
28 29				\$	72,643.44	\$	167.46	0.14	\$ 7,378.10	6.21	\$	1,198.38	1.01
30 31	SUBTOTAL INDUSTRIALS	\$	•	\$	4,386,307.66	\$	10,741.87	0.14	\$ 463,673.76	6.09	\$	76,869.19	1.01
32 33				\$	64,395.96	\$	114.71	0.14	\$ 6,822.16	8.39	\$	820.84	1.01
34 35	TOTAL INDUSTRIALS	\$	-	\$	4,450,703.62	\$	10,856.58	0.14	\$ 470,495.92	6.11	\$	77,690.03	1.01
36 37	GRAND TOTAL	\$ 	5.00	\$	21,597,474.88	\$	43,519.77	0.14	\$ 2,091,212.22	6.78	\$	311,428.72	1.01

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members July 2016

1 2	JULY 2016		REVENUE \$	REVENUE MILLS/ KWH		MRSM \$	MRSM MILLS/ KWH	M	N 2013-00199 RSM TO OFF- SET BASE RATE INCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	N	REVENUE \$ ET OF MRSM \$ AND BASE MTE CREDIT \$	REV NET OF MRSM AND BASE RATE CREDIT MILLS/KWH
3	JP RURALS	\$	5,650,449,16	82.28	\$	(392,724.64)	(5.72)	 \$	(496,599,54)	· ·····			
4	KENERGY RURALS	\$	9,814,421.01	82.36	Š	(760,949.84)	(6.39)	Ф \$	(496, 599.54) (991, 440, 18)	(7.23)	\$	4,761,124.98	69.33
5	MEADE CO. RURALS	\$	3,569,019,27	81.47	ŝ	(297,590,58)	(6,79)	φ ¢	(404,544.85)	(8.32)	\$	8,062,030.99	67.65
6						(401,000.00)	(0.73)	φ	(404,044.60)	(9.23)	\$	2,866,883.84	65.44
7 8	TOTAL RURALS	\$	19,033,889.44	82.17	\$	(1,451,265.06)	(6.26)	\$	(1,892,584.57)	(8.17)	 \$	15,690,039.81	67.73
9 10		\$	168,196.61	70.28	\$	(2,585.40)	(1.08)	\$		0.00	 \$	165,611,21	69.20
		\$	2,878.86	87.50	\$	(32.51)	(0.99)	\$	-	0.00	\$	2,846.35	86.52
11		\$	978,260.88	64.37	\$	(15,270.68)	(1.00)	\$	-	0.00	ŝ	962,990,20	63.37
12		\$	43,302.38	84.60	\$	(630.13)	(1.23)	\$		0.00	ŝ	42,672,25	83.37
13		\$	292,474.30	78.33	\$	(4,205.52)	(1.13)	\$	-	0.00	\$	288.268.78	77.20
14		\$	69,041.67	87.38	\$	(998.35)	(1.26)	\$	-	0.00	\$	68,043.32	86.12
15		\$	26,263.86	83.11	\$	(383.61)	(1.21)	\$	-	0.00	ŝ	25,880.25	81.89
16		\$	62,920.87	124.09	\$	(896.22)	(1.77)	\$	-	0.00	\$	62,024,65	122.32
17		\$	660,009.15	59.22	\$	(10,465.75)	(0.94)	\$	-	0.00	ŝ	649,543.40	58.28
18		\$	1,327.83	93.05	\$	(19.56)	(1.37)	\$	-	0.00	\$	1,308.27	91.68
19		\$	8,875.42	0.00	\$	(113.34)	0.00	\$		0.00	\$	8,762.08	0.00
20		\$	2,268.32	90.52	\$	(33.54)	(1.34)	\$	-	0.00	\$	2,234,78	89.18
21		\$	1,572,513.45	60.23	\$	(24,853.90)	(0.95)	\$	-	0.00	φ ¢	1,547,659.55	59.28
22		\$	123,083.05	81.53	\$	(1,757.63)	(1.16)	Ś	-	0.00	φ	121,325,42	
23		\$	110,855.26	70.30	\$	(1,703.90)	(1.08)	ŝ	-	0.00	\$	109,151.36	80.36
24		\$	2,281.75	89.94	\$	(33.77)	(1.33)	ŝ	_	0.00	φ \$	2,247.98	69.22
25		\$	10,544.14	98.65	\$	(154.19)	(1.44)	ŝ	-	0.00	φ \$	10.389.95	88.61
26		\$	284,718.10	62.70	\$	(4,466.00)	(0.98)	ŝ	_	0.00	φ \$	280,252,10	97.21
27		\$	436,389.20	67.53	\$	(6,733.99)	(1.04)	ŝ	_	0.00	φ \$	429.655.21	61.72
28		\$	81,387.38	68.53	\$	(1,213.63)	(1.02)	ŝ	_	0.00	գ Տ	429,655.21 80,173.75	66.49
29	·									0.00	φ	00,178.79	67.50
30 31	SUBTOTAL INDUSTRIALS	\$	4,937,592.48	64.81	\$	(76,551.62)	(1.00)	\$	•	0.00	\$	4,861,040.86	63.81
32 33		\$ 	72,153.67	88.69	\$	(1,070.15)	(1.32)	\$	-	0.00	\$	71,083.52	87.38
34 35	TOTAL INDUSTRIALS	\$	5,009,746.15	65.06	\$	(77,621.77)	(1.01)	\$	-	0.00	\$	4,932,124.38	64.06
36 37	GRAND TOTAL	\$ ====	24,043,635.59	77.90	\$	(1,528,886.83)	(4.95)	\$	(1,892,584.57)	(6.13)	\$	20,622,164.19	66.81

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members August 2016

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1 2	AUGUST 2016	KW BILLED	кwн		DEMAND \$		BASE ENERGY \$	D	EMAND \$ AND ENERGY \$] F	POWER FACTOR PENALTY (PFP) \$]	BILLING ADJ		DEMAND \$ ENERGY \$ AND PFP \$
3	JP RURALS	136,103	66.718.190	\$	1,878,901.92	\$	3,002,318,55	\$	4,881,220.47					 0	4 991 999 477
4	KENERGY RURALS	249,548	121,825,951	\$	3,445,010,14	ŝ	5,482,167.80	ŝ	8,927,177.94					ф е	4,881,220.47
5	MEADE CO. RURALS	89,528	44,248,720	\$	1,235,934.04	\$	1,991,192.40	\$	3,227,126.44					ф \$	8,927,177.94 3,227,126,44
6 7	TOTAL RURALS	475,179	232,792,861	\$	6,559,846.10	\$	10,475,678.75	 \$	17,035,524.85	 \$		 \$	- -	 \$	17,035,524.85
8 9		5,413	2,517,960	 \$	FR 000 00		05 000 00								
10		53	2,317,500	φ \$	58,000.30 567.90	Ð Ð	95,808.38	\$	153,808.68	\$	-	\$	-	\$	153,808.68
11		26,167	11,945,040	φ Φ		\$	1,273.15	\$	1,841.05	\$	567.90	\$	-	\$	2,408.95
12		1,797	643,310	ው ው	280,379.41	\$	454,508.77	\$	734,888.18	\$	-	\$	-	\$	734,888.18
13		10,521	4,400,750	ֆ Տ	19,254.86	\$	24,477.95	\$	43,732.81	\$	664.33	\$	-	\$	44,397.14
14		2,760			112,732.52	\$	167,448.54	\$	280,181.06	\$	-	\$	15,850.92	\$	296,031.98
15		1,000	831,490	\$	29,573.40	\$	31,638.19	\$	61,211.59	\$	-	\$	2,210.48	\$	63,422.07
16			297,340	\$	10,715.00	\$	11,313.79	\$	22,028.79	\$	-	\$	920.38	\$	22,949.17
17		3,415	591,400	\$	36,591.73	\$	22,502.77	\$	59,094.50	\$	-	\$	-	\$	59,094.50
18		15,000	11,138,795	\$	160,725.00	\$	423,831.15	\$	584,556.15	\$	-	\$	-	\$	584,556.15
19		60	13,940	\$	642.90	\$	530.42	\$	1,173.32	\$	-	\$	-	\$	1,173.32
20		750	0	\$	8,036.25	\$	-	\$	8,036.25	\$	-	\$	33,882.44	\$	41,918.69
		100	24,310	\$	1,071.50	\$	925.00	\$	1,996.50	\$	-	\$	-	\$	1,996.50
21		37,368	26,611,480	\$	400,398.12	\$	1,012,566.81	\$	1,412,964.93	\$	-	\$	-	\$	1,412,964.93
22		4,322	1,913,940	\$	46,310.23	\$	72,825.42	\$	119,135.65	\$	7,125.48	\$	-	Ŝ	126,261.13
23		3,478	1,627,280	\$	37,266.77	\$	61,918.00	\$	99,184.77	\$		\$	-	ŝ	99,184.77
24		100	26,000	\$	1,071.50	\$	989.30	\$	2,060.80	\$	-	\$	-	ŝ	2,060.80
25		500	109,990	\$	5,357.50	\$	4,185.12	\$	9,542.62	\$	-	, \$	-	ŝ	9,542.62
26		7,575	4,788,670	\$	81,166.13	\$	182,208.89	\$	263,375.02	\$	-	\$	-	ŝ	263,375.02
27		12,636	7,369,100	\$	135,394.74	\$	280,394.26	\$	415,789.00	\$	-	ŝ	-	ŝ	415,789.00
28 29		2,157	1,300,830	\$	23,112.26	\$	49,496.58	\$	72,608.84	\$	3,214.50	\$	-	\$	75,823.34
25 30 31	SUBTOTAL INDUSTRIALS	135,172	76,185,085	\$	1,448,368.02	\$	2,898,842.49	\$	4,347,210.51	\$	11,572.21	\$	52,864.22	\$	4,411,646.94
32 33		3,337	734,070	\$	35,755.96	\$	27,931.36	\$	63,687.32	\$	•	\$	-	\$	63,687.32
34 35	TOTAL INDUSTRIALS	138,509	76,919,155	\$	1,484,123.98	\$	2,926,773.85	\$	4,410,897.83	\$	11,572.21	\$	52,864.22	\$	4,475,334.26
36 37	GRAND TOTAL	613,688	309,712,016	\$	8,043,970.08	\$	13,402,452.60	\$	21,446,422.68	\$	11,572.21	\$	52,864.22		21,510,859.11

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members August 2016

1	AUGUST 2016	REEN)WER \$	\mathbf{EI}	DEMAND \$ NERGY \$ PFP AND GREEN POWER \$	A	FUEL DJUSTMENT CLAUSE \$	FAC MILLS/ KWH	ES \$	ES MILLS/ KWH		NON MELTER NON FAC PPA	NSNFPPA MILLS/ KWH
2 3	JP RURALS	\$ 5.00	 \$	4,881,225,47	\$	75,258.12	1.13	 \$ 373,881.68	5.60	 ©	67.318.65	
4	KENERGY RURALS	\$ -	\$	8,927,177.94	\$	137,419.67	1.13	\$ 678,631.33	5.57	ŝ	122,922.38	1.01
5 6	MEADE CO. RURALS	\$ -	\$	3,227,126.44	\$	49,912.56	1.13	\$ 242,802.51	5.49	\$	44,646.96	1.01
7	TOTAL RURALS	\$ 5.00	\$	17,035,529.85	\$	262,590.35	1.13	\$ 1,295,315.52	5.56	\$	234,887.99	1.01
8 9		 	\$	153,808.68	\$	2,840.26	1.13	\$ 13,262.63	5.27	\$	2,540.62	1.01
10			\$	2,408.95	\$	37.74	1.13	\$ 159.34	4.76	\$	33.76	1.01
11			\$	734,888.18	\$	13,474.01	1.13	\$ 63,352.77	5.30	\$	12,052.55	1.01
12			\$	44,397.14	\$	725.65	1.13	\$ 3,758.07	5.84	\$	649.10	1.01
13			\$	296,031.98	\$	4,964.05	1.13	\$ 24,126.36	5.48	\$	4,440.36	1.01
14			\$	63,422.07	\$	937.92	1.13	\$ 5,247.79	6.31	\$	838.97	1.01
15			\$	22,949.17	\$	335.40	1.13	\$ 1,888.23	6.35	\$	300.02	1.01
16			\$	59,094.50	\$	667.10	1.13	\$ 5,028.66	8.50	\$	596.72	1.01
17			\$	584,556.15	\$	12,564.56	1.13	\$ 50,684.54	4.55	\$	11,239.04	1.01
18			\$	1,173.32	\$	15.72	1.13	\$ 100.24	7.19	\$	14.07	1.01
19			\$	41,918.69	\$	•	0.00	\$ 669.53	0.00	\$	-	0.00
20			\$	1,996.50	\$	27.42	1.13	\$ 170.66	7.02	\$	24.53	1.01
21			\$	1,412,964.93	\$	30,017.75	1.13	\$ 122,456.90	4.60	\$	26,850.98	1.01
22			\$	126,261.13	\$	2,158.92	1.13	\$ 10,266.36	5.36	\$	1,931.17	1.01
23			\$	99,184.77	\$	1,835.57	1.13	\$ 8,553.15	5.26	\$	1,641.93	1.01
24			\$	2,060.80	\$	29.33	1.13	\$ 176.32	6.78	\$	26.23	1.01
25			\$	9,542.62	\$	124.07	1.13	\$ 814.61	7.41	\$	110.98	1.01
26			\$	263,375.02	\$	5,401.62	1.13	\$ 22,795.26	4.76	\$	4,831.77	1.01
27			\$	415,789.00	\$	8,312.34	1.13	\$ 35,952.81	4.88	\$	7,435.42	1.01
28 29		 	\$	75,823.34	\$	1,467.34	1.18	\$ 6,280.89	4.83	\$	1,312.54	1.01
30 31	SUBTOTAL INDUSTRIALS	\$ -	\$	4,411,646.94	\$	85,936.77	1.13	\$ 375,745.12	4.93	\$	76,870.76	1.01
32 33		 	\$	63,687.32	\$	828.03	1.13	\$ 5,436.70	7.41	\$	740.68	1.01
34 35	TOTAL INDUSTRIALS	\$ -	\$	4,475,334.26	\$	86,764.80	1.13	\$ 381,181.82	4.96	\$	77,611.44	1.01
36 37	GRAND TOTAL	\$ 5.00	\$	21,510,864.11	\$	349,355.15	1.13	\$ 1,676,497.34	5.41	\$	312,499.43	1.01

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members August 2016

1 2	AUGUST 2016	REVENUE \$	REVENUE MILLS/ KWH		MRSM \$	MRSM MILLS/ KWH	М	N 2013-00199 RSM TO OFF- SET BASE RATE INCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	N	REVENUE \$ ET OF MRSM \$ AND BASE ATE CREDIT \$	REV NET OF MRSM AND BASE RATE CREDIT MILLS/KWH
3	JP RURALS	\$ 5,397,683.92	80.90	\$	(420,096,72)	(6.30)	e	(536,145.78)				
4	KENERGY RURALS	\$ 9,866,151.32	80.99	\$	(755,685,16)	(6.20)	φ \$	(1,041,999.53)	(8.04)	\$	4,441,441.42	66.57
5	MEADE CO. RURALS	\$ 3,564,488.47	80.56	\$	(281,288.25)	(6.36)	φ \$	(407,360.19)	(8.55) (9.21)	\$	8,068,466.63	66.23
6				Ψ	(201,200.20)	(0.30)	φ	(407,300.19)	(9.21)	\$ •	2,875,840.03	64.99
7 8	TOTAL RURALS	\$ 18,828,328.71	80.88	\$	(1,457,070.13)	(6.26)	\$	(1,985,505.50)	(8.53)		15,385,748.08	66.09
9		\$ 172,452.19	68.49	\$	(2,411.45)	(0.96)	\$		0.00	 \$	170,040,74	67.53
10		\$ 2,639.79	78.89	\$	(29.91)	(0.89)	\$	-	0.00	\$	2,609,88	78.00
11		\$ 823,767.51	68.96	\$	(11,494.58)	(0.96)	\$	-	0.00	\$	812,272.93	68.00
12		\$ 49,529.96	76.99	\$	(662.62)	(1.03)	\$	-	0.00	\$	48,867.34	75.96
13		\$ 329,562.75	74.89	\$	(4,333.77)	(0.98)	\$	-	0.00	\$	325,228.98	73.90
14		\$ 70,446.75	84.72	\$	(905.62)	(1.09)	\$	-	0.00	\$	69,541.13	83.63
15		\$ 25,472.82	85.67	\$	(325.30)	(1.09)	\$		0.00	\$	25,147.52	84.57
16		\$ 65,386.98	110.56	\$	(807.29)	(1.37)	\$	-	0.00	\$	64,579,69	109.20
17		\$ 659,044.29	59.17	\$	(9,662.22)	(0.87)	\$	-	0.00	\$	649,382.07	58.30
18		\$ 1,303.35	93.50	\$	(16.72)	(1.20)	\$	-	0.00	\$	1,286.63	92.30
19 20		\$ 42,588.22	0.00	\$	(84.28)	0.00	\$	-	0.00	\$	42,503.94	0.00
		\$ 2,219.11	91.28	\$	(28.64)	(1.18)	\$	-	0.00	\$	2,190.47	90.11
21		\$ 1,592,290.56	59.83	\$	(23,255.97)	(0.87)	\$	-	0.00	\$	1,569,034,59	58.96
22		\$ 140,617.58	78.47	\$	(1,856.30)	(0.97)	\$	-	0.00	\$	138,761.28	72.50
23		\$ 111,215.42	68.34	\$	(1,556.17)	(0.96)	\$	-	0.00	\$	109,659,25	67.39
24		\$ 2,292.68	88.18	\$	(29.85)	(1.15)	\$	-	0.00	\$	2,262.83	87.03
25		\$ 10,592.28	96.30	\$	(134.95)	(1.23)	\$	-	0.00	\$	10,457.33	95.08
26		\$ 296,403.67	61.90	\$	(4,280.47)	(0.89)	\$	-	0.00	\$	292,123,20	61.00
27		\$ 467,489.57	63.44	\$	(6,697.08)	(0.91)	\$	-	0.00	\$	460,792.49	62.53
28 29		\$ 84,884.11	65.25	\$	(1,173.94)	(0.90)	\$	•	0.00	\$	83,710.17	64.35
30 31	SUBTOTAL INDUSTRIALS	\$ 4,950,199.59	64.98	\$	(69,747.13)	(0.92)	\$	-	0.00	\$	4,880,452.46	64.06
32 33		\$ 70,692.73	96.30	\$	(900.69)	(1.23)	\$		0.00	\$	69,792.04	95.08
34 35	TOTAL INDUSTRIALS	\$ 5,020,892.32	65.27	\$	(70,647.82)	(0.92)	\$	-	0.00	\$	4,950,244.50	64.36
36 37	GRAND TOTAL	\$ 23,849,216.03	77.00	\$	(1,527,717.95)	(4.93)	\$	(1,985,505.50)	(6.41)	\$	20,335,992.58	65.66

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members September 2016

1 2	SEPTEMBER 2016	KW BILLED	KWH		DEMAND \$		BASE ENERGY \$	D	EMAND \$ AND ENERGY \$	I	POWER FACTOR PENALTY (PFP) \$	1	BILLING ADJ		DEMAND \$ ENERGY \$ AND PFP \$
3	JP RURALS	135,808	56,552,520	\$	1,874,829.44	\$	2,544,863.40		4,419,692.84						4 410 609 94
4	KENERGY RURALS	246,640	102,617,640	\$	3,404,865.20	ŝ	4,617,793.80	ŝ	8,022,659.00					φ e	4,419,692.84 8,022,659,00
5 6	MEADE CO. RURALS	86,617	36,598,350	\$	1,195,747.69	\$	1,646,925.75	\$	2,842,673.44					φ \$	2,842,673.44
7	TOTAL RURALS	469,065	195,768,510	\$	6,475,442.33	\$	8,809,582.95	\$	15,285,025.28	\$	-	\$	 -	 \$	15,285,025.28
9		5,269	2,259,750	 \$	56,457.34		85,983,49	 \$	149,440,00						
10		55	32,020	\$	589.33	\$	1,218.36	գ Տ	142,440.83 1,807.69	\$ \$	-	\$	-	\$	142,440.83
11		27,317	14,562,850	ŝ	292,701.66	\$	554,116.44	φ \$	846,818.10		642.90	\$	-	\$	2,450.59
12		1,648	451,890	ŝ	17,658.32	s \$	17,194.41	Ф \$	34,852.73	\$	-	\$	-	\$	846,818.10
13		10,313	4,429,100	ŝ	110,503.80	φ \$	168,527,26	φ \$	279,031.06	\$	-	\$	-	\$	34,852.73
14		2,760	795,670	\$	29,573.40	φ	30,275.24	φ \$	279,031.06 59,848.64	\$	7,896.96	\$	15,238.97	\$	302,166.99
15		1,000	259,820	\$	10,715.00	φ	9,886.15	φ \$	•	\$	-	\$	2,398.55	\$	62,247.19
16		3,402	564,960	ŝ	36,452,43	φ S	21,496.73	ф \$	20,601.15 57,949.16	۵ ۵	-	\$	363.88	\$	20,965.03
17		15.000	10,717,418	ŝ	160,725.00	φ \$	407,797.75	Ф \$		\$	-	\$	-	\$	57,949.16
18		60	11,930	ŝ	642.90	\$	453.94	φ \$	568,522.75	¢ n	-	\$	-	\$	568,522.75
19		0	11,000	\$	044.00	φ S	400.74	ф \$	1,096.84	Þ	-	\$	-	\$	1,096.84
20		100	25,770	\$	1,071.50	\$	- 980.55	ው ው	- 0.050.05	\$	-	\$	-	\$	•
21		37,498	24,417,870	ŝ	401,791.07	φ \$	929,099.95	¢ ¢	2,052.05	\$	-	\$	-	\$	2,052.05
22		4,482	1,797,900	\$	48,024.63	φ S	68,410.10	\$ \$	1,330,891.02	\$	-	\$	-	\$	1,330,891.02
23		3,447	1,576,260	\$	36,934.61	ф \$	59,976.69	-	116,434.73	\$	7,393.35	\$	-	\$	123,828.08
24		100	23,540	Տ	1,071.50	Ф \$		\$	96,911.30	\$	-	\$	-	\$	96,911.30
25		500	23,340 98,670	φ \$	5,357.50	Փ Տ	895.70	\$	1,967.20	\$	-	\$	-	\$	1,967.20
26		7,643	4,456,150	φ ¢	81,894.75	-	3,754.39	\$	9,111.89	\$	-	\$	-	\$	9,111.89
27		12,390	6.811.350	φ \$		\$	169,556.51	\$	251,451.26	\$	-	\$	-	\$	251,451.26
28		2,478	1,230,040	φ \$	132,758.85	\$	259,171.87	\$	391,930.72	\$	1,489.39	\$	-	\$	393,420.11
29			1,230,040	φ	26,551.77	\$	46,803.02	\$	73,354.79	\$	3,321.65	\$	-	\$	76,676.44
30 31	SUBTOTAL INDUSTRIALS	135,462	74,522,958	\$	1,451,475.36	\$	2,835,598.55	\$	4,287,073.91	\$	20,744.25	\$	18,001.40	\$	4,325,819.56
32 33		1,814	380,210	\$	19,437.01	\$	14,466.99	\$	33,904.00	\$	-	\$	-	\$	33,904.00
34 35	TOTAL INDUSTRIALS	137,276	74,903,168	\$	1,470,912.37	\$	2,850,065.54	\$	4,320,977.91	\$	20,744.25	\$	18,001.40	\$	4,359,723.56
36 37	GRAND TOTAL	606,341	270,671,678	\$	7,946,354.70	\$	11,659,648.49	\$	19,606,003.19	\$	20,744.25	\$	18,001.40	\$	19,644,748.84

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members September 2016

1 2	SEPTEMBER 2016		REEN OWER \$	E	DEMAND \$ NERGY \$ PFP AND GREEN POWER \$	AI	FUEL DJUSTMENT CLAUSE \$	FAC MILLS/ KWH	ES \$	ES MILLS/ KWH	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
3	JP RURALS	\$	5.00	s	4,419,697.84	 \$	32,800.46	0.58	 \$ 339,482.93	6.00	 \$ 75,554,17	1.34
4	KENERGY RURALS	\$	-	\$	8,022,659.00	\$	59,518.23	0.58	\$ 616,226.62	6.01	137.097.17	1.34
5 6	MEADE CO. RURALS	\$	-	\$	2,842,673.44	\$	21,227.04	0.58	\$ 218,382.09	5.97	\$ 48,895.40	1.34
7	TOTAL RURALS	\$	5.00	\$	15,285,030.28	\$	113,545.73	0.58	\$ 1,174,091.64	6.00	\$ 261,546.74	1.34
9				\$	142,440.83	\$	1,310.66	0.58	\$ 11,003.88	4.87	\$ 3,019.03	1.34
10				\$	2,450.59	\$	18.57	0.58	\$ 140.13	4.38	\$ 42.78	1.34
11				\$	846,818.10	\$	8,446.45	0.58	\$ 65,580.74	4.50	\$ 19,455.97	1.34
12				\$	34,852.73	\$	262.10	0.58	\$ 2,677.94	5.93	\$ 603.73	1.34
13				\$	302,166.99	\$	2,568.88	0.58	\$ 21,556.13	4.87	\$ 5,917.28	1.34
14				\$	62,247.19	\$	461.49	0.58	\$ 4,601.35	5.78	\$ 1,063.02	1.34
15				\$	20,965.03	\$	150.70	0.58	\$ 1,581.86	6.09	\$ 347.12	1.34
16				\$	57,949.16	\$	327.68	0.58	\$ 4,425.80	7.83	\$ 754.79	1.34
17				\$	568,522.75	\$	6,216.10	0.58	\$ 44,163.61	4.12	\$ 14,318.47	1.34
18				\$	1,096.84	\$	6.92	0.58	\$ 83.95	7.04	\$ 15.94	1.34
19				\$	• • • • • •	\$	-	0.00	\$ -	0.00	\$ -	0.00
20				\$	2,052.05	\$	14.95	0.58	\$ 157.55	6.11	\$ 34.43	1.34
21				\$	1,330,891.02	\$	14,162.36	0.58	\$ 103,288.97	4.23	\$ 32,622.27	1.34
22				\$	123,828.08	\$	1,042.78	0.58	\$ 8,987.77	5.00	\$ 2,401.99	1.34
23				\$	96,911.30	\$	914.23	0.58	\$ 7,492.19	4.75	\$ 2,105.88	1.34
24				\$	1,967.20	\$	13.65	0.58	\$ 150.87	6.41	\$ 31.45	1.34
25				\$	9,111.89	\$	57.23	0.58	\$ 697.32	7.07	\$ 131.82	1.34
26				\$	251,451.26	\$	2,584.57	0.58	\$ 19,492.27	4.37	\$ 5,953.42	1.34
27				\$	393,420.11	\$	3,950.58	0.58	\$ 30,362.81	4.46	\$ 9,099.96	1.34
28 29				\$	76,676.44	\$ 	713.42	0.58	\$ 5,676.35	4.61	\$ 1,643.33	1.34
30 31	SUBTOTAL INDUSTRIALS	\$	-	\$	4,325,819.56	\$	43,223.32	0.58	\$ 332,121.49	4.46	\$ 99,562.68	1.34
32 33		I		\$	33,904.00	\$	220.52	0.58	\$ 2,596.51	6.83	\$ 507.96	1.34
34 35	TOTAL INDUSTRIALS	\$	-	\$	4,359,723.56	\$	43,443.84	0.58	\$ 334,718.00	4.47	\$ 100,070.64	1.34
36 37	GRAND TOTAL	\$	5.00	\$	19,644,753.84	\$	156,989.57	0.58	\$ 1,508,809.64	5.57	\$ 361,617.38 ========	1.34

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members September 2016

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12	SEPTEMBER 2016		REVENUE \$	REVENUE MILLS/ KWH		MRSM \$	MRSM MILLS/ KWH	MF	N 2013-00199 RSM TO OFF- SET BASE RATE INCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	N	REVENUE \$ ET OF MRSM \$ AND BASE ATE CREDIT \$	REV NET OF MRSM AND BASE RATE CREDIT MILLS/KWH
3	JP RURALS	\$	4,867,535,40	86.07	\$	(342,829,05)	(6.06)	• •			··· -···	4 504 500 05	
4	KENERGY RURALS	Ś	8,835,501.02	86.10	\$	(615,837.98)	(6.00)	Ф \$	•	0.00	\$	4,524,706.35	80.01
5	MEADE CO. RURALS	ŝ	3,131,177.97	85.56	ŝ	(232,551.22)	(6.35)	φ ¢	-	0.00	\$	8,219,663.04	80.10
6					Ψ	(202,001.22)	(0.00)	φ	-	0.00	\$	2,898,626.75	79.20
7	TOTAL RURALS	\$	16,834,214.39	85.99	\$	(1,191,218.25)	(6.08)	\$	-	0.00	\$	15,642,996.14	79.91
9 10		\$	157,774.40	69.82	\$	(2,273.79)	(1.01)	\$	-	0.00	 \$	155,500.61	68.81
		\$	2,652.07	82.83	\$	(29.83)	(0.93)	\$	-	0.00	\$	2,622.24	81.89
11		\$	940,301.26	64.57	\$	(13,847.73)	(0.95)	\$	-	0.00	\$	926,453.53	63.62
12 13		\$	38,396.50	84.97	\$	(526.81)	(1.17)	\$	-	0.00	\$	37,869.69	83.80
13		\$	332,209.28	75.01	\$	(4,454.89)	(1.01)	\$	•	0.00	\$	327,754.39	74.00
14		\$	68,373.05	85.93	\$	(910.39)	(1.14)	\$	-	0.00	\$	67,462.66	84.79
16		\$	23,044.71	88.69	\$	(309.26)	(1.19)	\$	-	0.00	\$	22,735.45	87.50
10		\$	63,457.43	112.32	\$	(821.43)	(1.45)	\$	-	0.00	\$	62,636.00	110.87
18		\$	633,220.93	59.08	\$	(9,571.83)	(0.89)	\$	-	0.00	\$	623,649.10	58.19
		\$	1,203.65	100.89	\$	(15.90)	(1.33)	\$	-	0.00	\$	1,187.75	99.56
19		\$	•	0.00	\$	-	0.00	\$	-	0.00	\$	-	0.00
20		\$	2,258.98	87.66	\$	(30.77)	(1.19)	\$	-	0.00	\$	2,228,21	86.47
21		\$	1,480,964.62	60.65	\$	(22,211.04)	(0.91)	\$	-	0.00	\$	1,458,753.58	59.74
22		\$	136,260.62	75.79	\$	(1,844.25)	(1.03)	\$		0.00	\$	134,416,37	74.76
23		\$	107,423.60	68.15	\$	(1,558.35)	(0.99)	\$	-	0.00	\$	105,865,25	67.16
24		\$	2,163.17	91.89	\$	(29.15)	(1.24)	\$	-	0.00	\$	2,134.02	90.66
25		\$	9,998.26	101.33	\$	(132.03)	(1.34)	\$		0.00	ŝ	9,866,23	99,99
26		\$	279,481.52	62.72	\$	(4,150.47)	(0.93)	\$	-	0.00	\$	275,331.05	61.79
27		\$	436,833.46	64.13	\$	(6,429.95)	(0.94)	\$	-	0.00	\$	430,403,51	63.19
28 29		\$	84,709.54	68.87	\$	(1,190.34)	(0.97)	\$	-	0.00	\$	83,519.20	67.90
30 31	SUBTOTAL INDUSTRIALS	\$	4,800,727.05	64.42	\$	(70,338.21)	(0.94)	\$	•	0.00	\$	4,730,388.84	63.48
32 33		\$	37,228.99	97.92	\$	(495.11)	(1.30)	\$	-	0.00	\$	36,733.88	96.61
34 35	TOTAL INDUSTRIALS	\$	4,837,956.04	64.59	\$	(70,833.32)	(0.95)	\$		0.00	\$	4,767,122.72	63.64
36 37	GRAND TOTAL	\$	21,672,170.43	80.07	\$	(1,262,051.57)	(4.66)	\$		0.00	\$	20,410,118.86	75.41

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members October 2016

1 2	OCTOBER 2016	KW BILLED	KWH		DEMAND \$		BASE ENERGY \$	DI	EMAND \$ AND ENERGY \$		POWER FACTOR PENALTY (PFP) \$]	BILLING ADJ		DEMAND \$ ENERGY \$ AND PFP \$
3	JP RURALS	103,263	43,746,620	\$	1,425,545.72	\$	1,968,597,90		3,394,143.62						0.004.140.00
4	KENERGY RURALS	183,119	80,193,957	\$	2,527,957.80	\$	3,608,728.07	\$	6,136,685.87					\$	3,394,143.62
5 6	MEADE CO. RURALS	65,249	29,923,260	\$	900,762.45	\$	1,346,546.70	\$	2,247,309.15					\$ \$	6,136,685.87 2,247,309.15
78	TOTAL RURALS	351,631	153,863,837	\$	4,854,265.97	\$	6,923,872.67	 \$	11,778,138.64	 \$		 \$		 \$	11,778,138.64
9		5,337	1,905,750	 \$	57,185.96	 @	72,513,79	 מ	100 000 85						
10		55	33,110	\$	589.33	ф \$	1,259.84	ֆ Տ	129,699.75	\$	-	\$	-	\$	129,699.75
11		27,457	15,526,037	ŝ	294,201,76	φ S	1,255.84 590,765.71	ዋ ጜ	1,849.17	\$	739.34	\$	-	\$	2,588.51
12		1,789	521,790	ŝ	19,169.14	φ \$	19.854.11	ቅ \$	884,967.47	\$	-	\$	-	\$	884,967.47
13		10.464	4,384,718	ŝ	112,121.76	φ S	166,838.52	Ф \$	39,023.25 278.960.28	\$		\$	•	\$	39,023.25
14		2,760	782,251	ŝ	29,573.40	φ \$	29,764.65	թ Տ		\$	8,004.11	\$	16,384.36	\$	303,348.75
15		1,000	300,028	ŝ	10,715.00	φ \$	25,764.65 11,416.07	ф \$	59,338.05	\$	-	\$	1,881.61	\$	61,219.66
16		3,490	663,220	ŝ	37,395.35	\$	25,235,52	φ \$	22,131.07	Þ	-	\$	320.59	\$	22,451.66
17		15,000	11,154,257	\$	160,725.00	φ \$	424,419,48	ф \$	62,630.87	\$	-	\$	-	\$	62,630.87
18		60	10,520	\$	642.90	φ Φ	400.29	Ψ	585,144.48	\$	-	\$	-	\$	585,144.48
19		0	10,020	\$	042.50	ф ¢	400.29	\$	1,043.19	\$	-	\$	-	\$	1,043.19
20		100	24,580	\$	1,071.50	φ \$	005.07	\$	-	\$	-	\$	-	\$	-
21		36,893	26,614,080	φ \$	395,308,50	Տ	935.27	\$	2,006.77	\$	-	\$	•	\$	2,006.77
22		4,844	1,992,700	φ \$	46,545.96	ֆ Տ	1,012,665.74	\$	1,407,974.24	\$	-	\$	-	\$	1,407,974.24
23		3,402	1,366,370	φ S	36,452,43	ф \$	75,822.24	\$	122,368.20	\$	6,482.58	\$	-	\$	128,850.78
24		100	31,260	φ \$	1,071.50	Դ Տ	51,990.38	\$	88,442.81	\$	-	\$	-	\$	88,442.81
25		475	87,460	φ \$	5.089.63	-	1,189.44	\$	2,260.94	\$	-	\$	-	\$	2,260.94
26		7,416	4,413,250	φ S	79,462,44	\$	3,327.85	\$	8,417.48	\$	-	\$	-	\$	8,417.48
27		12,292	6,448,871	φ Φ	131,708.78	\$	167,924.16	\$	247,386.60	\$	-	\$	-	\$	247,386.60
28		2,524	1,361,910	φ \$	27,044.66	\$	245,379.54	\$	377,088.32	\$	1,478.67	\$	-	\$	378,566.99
29			1,301,310	φ 	27,044.00	\$	51,820.68	\$	78,865.34	\$	3,385.94	\$	-	\$	82,251.28
30 31	SUBTOTAL INDUSTRIALS	134,958	77,622,162	\$	1,446,075.00	\$	2,953,523.28	\$	4,399,598.28	\$	20,090.64	\$	18,586.56	\$	4,438,275.48
32 33		1,782	560,990	\$	19,094.13	\$	21,345.67	\$	40,439.80	\$	-	\$	-	\$	40,439.80
34 35	TOTAL INDUSTRIALS	136,740	78,183,152	\$	1,465,169.13	\$	2,974,868.95	\$	4,440,038.08	\$	20,090.64	\$	18,586.56	\$	4,478,715.28
36 37	GRAND TOTAL	488,371	232,046,989	\$	6,819,435.10 	\$ ====	9,898,741.62	\$	16,218,176.72	\$	20,090.64 =≈	\$	18,586.56 ====	\$	16,256,853.92

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members October 2016

1 2	OCTOBER 2016	REEN OWER \$	\mathbf{E}	DEMAND \$ NERGY \$ PFP AND GREEN POWER \$	Al	FUEL DJUSTMENT CLAUSE \$	FAC MILLS/ KWH	ES \$	ES MILLS/ KWH		NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH
3	JP RURALS	\$ 5.00	\$	3,394,148.62	\$	(75,987,88)	(1.74)	\$ 223,899.93	5.12	\$	58.445.48	1.34
4	KENERGY RURALS	\$ -	\$	6,136,685.87	\$	(139,296.90)	(1.74)	\$ 404,786.74	5.05	ŝ	107,139,13	1.34
5 6	MEADE CO. RURALS	\$ •	\$	2,247,309.15	\$	(51,976.70)	(1.74)	\$ 148,221.75	4.95	\$	39,977.48	1.34
7	TOTAL RURALS	\$ 5.00	\$	11,778,143.64	\$	(267,261.48)	(1.74)	\$ 776,908.42	5.05	\$	205,562.09	1.34
8 9		 	 \$	129,699.75	 \$	(3,310.29)	(1.74)	 \$ 8,549.62	4.49	 \$	2,546.08	1.34
10			\$	2,588.51	\$	(57.51)	(1.74)	\$ 121.74	3.68	\$	44.23	1.34
11			\$	884,967.47	\$	(26,968.73)	(1.74)	\$ 58,268.70	3.75	\$	20,742.79	1.34
12			\$	39,023.25	\$	(906.35)	(1.74)	\$ 2,573.73	4.93	\$	697.11	1.34
13			\$	303,348.75	\$	(7,616.26)	(1.74)	\$ 18,381.06	4.19	\$	5,857.98	1.34
14			\$	61,219.66	\$	(1,358.77)	(1.74)	\$ 3,913.86	5.00	\$	1,045.09	1.34
15			\$	22,451.66	\$	(521.15)	(1.74)	\$ 1,459.52	4.86	\$	400.84	1.34
16			\$	62,630.87	\$	(1,152.01)	(1.74)	\$ 4,135.37	6.24	\$	886.06	1.34
17			\$	585,144.48	\$	(19,374.94)	(1.74)	\$ 38,503.91	3.45	\$	14,902.09	1.34
. 18			\$	1,043.19	\$	(18.27)	(1.74)	\$ 68.89	6.55	\$	14.05	1.34
19			\$	-	\$	•	0.00	\$ •	0.00	\$	-	0.00
20			\$	2,006.77	\$	(42.70)	(1.74)	\$ 132.41	5.39	\$	32.84	1.34
21			\$	1,407,974.24	\$	(46,228.66)	(1.74)	\$ 92,654.06	3.48	\$	35,556.41	1.34
22			\$	128,850.78	\$	(3,461.32)	(1.74)	\$ 8,061.16	4.05	\$	2,662.25	1.34
23			\$	88,442.81	\$	(2,373.38)	(1.74)	\$ 5,828.25	4.27	\$	1,825.47	1.34
24			\$	2,260.94	\$	(54.30)	(1.74)	\$ 149.09	4.77	\$	41.76	1.34
25			\$	8,417.48	\$	(151.92)	(1.74)	\$ 555.83	6.36	\$	116.85	1.34
26			\$	247,386.60	\$	(7,665.82)	(1.74)	\$ 16,286.67	3.69	\$	5,896.10	1.34
27			\$	378,566.99	\$	(11,201.69)	(1.74)	\$ 24,832.97	3.85	\$	8,615.69	1.34
28 29		 	\$	82,251.28	\$	(2,365.64)	(1.74)	\$ 5,193.29	3.81	\$	1,819.51	1.34
30 31	SUBTOTAL INDUSTRIALS	\$ -	\$	4,438,275.48	\$	(134,829.71)	(1.74)	\$ 289,670.13	3.73	\$	103,703.20	1.34
32 33			\$	40,439.80	\$	(974.44)	(1.74)	\$ 2,666.62	4.75	\$	749.48	1.34
34 35	TOTAL INDUSTRIALS	\$ -	\$	4,478,715.28	\$	(135,804.15)	(1.74)	\$ 292,336.75	3.74	\$	104,452.68	1.34
36 37	GRAND TOTAL	\$ 5.00	\$	16,256,858.92	\$	(403,065.63)	(1.74)	\$ 1,069,245.17	4.61	\$	310,014.77	1.34

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Members October 2016

1	OCTOBER 2016	REVENUE \$	REVENUE MILLS/ KWH		MRSM \$	MRSM MILLS/ KWH	MR	V 2013-00199 SM TO OFF- ET BASE RATE NCREASE	MRSM - BASE RATE CREDIT MILLS/ KWH	N	REVENUE \$ ET OF MRSM \$ AND BASE ATE CREDIT \$	REV NET OF MRSM AND BASE RATE CREDIT MILLS/KWH
3	JP RURALS	\$ 3,600,506,15	82.30	\$	(96,483.81)	(2.21)	• •••••		0.00	e	3,504,022.34	80.10
4	KENERGY RURALS	\$ 6,509,314.84	81.17	\$	(193,960.87)	(2.42)	\$		0.00	φ \$	6,315,353.97	78.75
5	MEADE CO. RURALS	\$ 2,383,531.68	79.65	\$	(68,506.14)	(2.29)	ŝ	-	0.00	\$	2,315,025.54	77.37
6				·····		(2.20)	Ψ			Ψ	2,010,020.04	11.07
7 8	TOTAL RURALS	\$ 12,493,352.67	81.20	\$	(358,950.82)	(2.33)	\$		0.00	\$	12,134,401.85	78.86
9		\$ 137,485.16	72.14	\$	(2,082.55)	(1.09)	\$	-	0.00	\$	135,402.61	71.05
10		\$ 2,696.97	81.45	\$	(28.78)	(0.87)	\$	-	0.00	\$	2,668.19	80.59
11		\$ 937,010.23	60.35	\$	(13,825.74)	(0.89)	\$	-	0.00	\$	923,184.49	59.46
12		\$ 41,387.74	79.32	\$	(634.43)	(1.22)	\$	-	0.00	\$	40,753.31	78.10
13		\$ 319,971.53	72.97	\$	(4,435.68)	(1.01)	\$	-	0.00	\$	315,535.85	71.96
14		\$ 64,819.84	82.86	\$	(966.40)	(1.24)	\$	-	0.00	\$	63,853.44	81.63
15		\$ 23,790.87	79.30	\$	(359.18)	(1.20)	\$	-	0.00	\$	23,431.69	78.10
16		\$ 66,500.29	100.27	\$	(1,044.76)	(1.58)	\$	-	0.00	\$	65,455.53	98.69
17		\$ 619,175.54	55.51	\$	(9,006.47)	(0.81)	\$	-	0.00	\$	610,169.07	54.70
18		\$ 1,107.86	105.31	\$	(17.48)	(1.66)	\$	-	0.00	\$	1,090.38	103.65
19		\$ -	-	\$	-	0.00	\$	-	0.00	\$	-	0.00
20		\$ 2,129.32	86.63	\$	(32.96)	(1.34)	\$	-	0.00	\$	2,096.36	85.29
21		\$ 1,489,956.05	55.98	\$	(21,705.62)	(0.82)	\$	-	0.00	\$	1,468,250.43	55.17
22		\$ 136,112.87	68.31	\$	(1,935.20)	(0.97)	\$	-	0.00	\$	134,177.67	67.33
23		\$ 93,723.15	68.59	\$	(1,409.93)	(1.03)	\$	-	0.00	\$	92,313.22	67.56
24		\$ 2,397.49	76.70	\$	(36.60)	(1.17)	\$	-	0.00	\$	2,360.89	75.52
25		\$ 8,938.24	102.20	\$	(140.66)	(1.61)	\$	-	0.00	\$	8,797.58	100.59
26		\$ 261,903.55	59.34	\$	(3,853. 78)	(0.87)	\$	-	0.00	\$	258,049.77	58.47
27		\$ 400,813.96	62.15	\$	(5,916.59)	(0.92)	\$	-	0.00	\$	394,897.37	61.24
28 29		\$ 86,898.44	63.81	\$	(1,235.41)	(0.91)	\$	-	0.00	\$	85,663.03	62.90
30 31	SUBTOTAL INDUSTRIALS	\$ 4,696,819.10	60.51	\$	(68,668.22)	(0.88)	\$		0.00	\$	4,628,150.88	59.62
32 33		\$ 42,881.46	76.44	\$	(654.38)	(1.17)	\$	-	0.00	\$	42,227.08	75.27
34 35	TOTAL INDUSTRIALS	\$ 4,739,700.56	60.62	\$	(69,322.60)	(0.89)	\$	-	0.00	\$	4,670,377.96	59.74
36 37	GRAND TOTAL	\$ 17,233,053.23	74.27	\$	(428,273.42)	(1.85)	\$	-	0.00	\$	16,804,779.81	72.42

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Electric Utilities May 2016

1	MAY 2016	KWH		AMOUNT	REVENUE \$ MILLS/KWH
2					
3	SPECIAL SALES TO RUS BORROWERS:				
4	WI 64-DAIRYLAND POWER COOPERATIVE - CAPACITY SALES		\$	2,790.00	
5	KY 65-KENERGY-DOMTAR COGEN	14,412,166	\$	334,037.17	23.18
6	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP	,,	Ŧ		
7	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP - CAPACITY SALES		\$	150,000.00	
8	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP - CALL OPTION		Ŧ	200,000100	
9					
10	TOTAL SPECIAL SALES TO RUS BORROWERS	14,412,166	\$	486,827,17	33.78
11					
12	TO OTHER THAN RUS BORROWERS:				
13	ADM INVESTOR SERVICES		\$	(9,000.00)	
14	BP ENERGY - CAPACITY SALES		•		
15	CALPINE ENERGY SERVICES - CAPACITY SALES		\$	13,974.20	
16	CARGILL POWER MARKETS			-,	
17	EDF TRADING				
18	EDF TRADING - CAPACITY SALES		\$	150,000.00	
19	HMPL	5,345,000	\$	110,292.79	20.63
20	INDIANA MUNICIPAL POWER AGENCY - CAPACITY SALES	. ,	\$	200,000.00	
21	INDIANAPOLIS POWER & LIGHT - CAPACITY SALES		\$	150,015.00	
22	MISO	332,124,844	\$	7,602,114.82	22.89
23	NEXTRA ENERGY POWER MARKETING	264,000,000	\$	8,164,644.00	30.93
24					
25	TOTAL TO OTHER THAN RUS BORROWERS	601,469,844	\$	16,382,040.81	27.24
26					
27	TOTAL	615,882,010	\$	16,868,867.98	27.39

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Electric Utilities June 2016

1	JUNE 2016	KWH		AMOUNT	REVENUE \$ MILLS/KWH
2				AMOUNI	
3	SPECIAL SALES TO RUS BORROWERS:				
4	WI 64-DAIRYLAND POWER COOPERATIVE - CAPACITY SALES		\$	-	
5	KY 65-KENERGY-DOMTAR COGEN	7,493,308	\$	249.538.71	33.30
6	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP	-,,	Ŧ		00.00
7	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP - CAPACITY SALES		\$	387,500.00	
8	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP - CALL OPTION		,		
9					
10	TOTAL SPECIAL SALES TO RUS BORROWERS	7,493,308	\$	637,038.71	85.01
11					
12	TO OTHER THAN RUS BORROWERS:				
13	ADM INVESTOR SERVICES		\$	132,934.00	
14	BP ENERGY-CAPACITY SALES				
15	CALPINE ENERGY SERVICES - CAPACITY SALES				
16	CARGILL POWER MARKETS				
17	EDF TRADING				
18	EDF TRADING - CAPACITY SALES				
19	HMPL	7,569,000	\$	190,562.71	25.18
20	INDIANA MUNICIPAL POWER AGENCY - CAPACITY SALES	, ,	\$	75,000.00	
21	INDIANAPOLIS POWER & LIGHT - CAPACITY SALES			,	
22	MISO	268,855,906	\$	6,378,583.11	23.72
23	MISO - CAPACITY SALES		\$	330,897.00	
24	NEXTRA ENERGY POWER MARKETING	108,800,000	\$	3,472,080.00	31.91
25	NEXTRA ENERGY POWER MARKETING - CAPACITY SALES		\$	37,500.00	
26					
27	TOTAL TO OTHER THAN RUS BORROWERS	385,224,906	\$	10,617,556.82	27.56
28			•	• •	
29	TOTAL	392,718,214	\$	11,254,595.53	28.66
			-		

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Electric Utilities July 2016

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1	JULY 2016	KWH		AMOUNT	REVENU MILLS/K
2 3	SPECIAL SALES TO RUS BORROWERS:				
4	WI 64-DAIRYLAND POWER COOPERATIVE - CAPACITY SALES				
5	KY 65-KENERGY-DOMTAR COGEN		\$	-	
6	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP	6,947,563	\$	261,159.95	37.59
7	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP IN106-HOOSIER ENERGY RURAL ELECTRIC COOP - CAPACITY SALES				
8	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP - CAPACITY SALES		\$	387,500.00	
9	MUUS-NOOSIER ENERGY RURAL ELECTRIC COUP - CALL OPTION				
10	TOTAL SPECIAL SALES TO RUS BORROWERS				
11	TO THE ST BOARD SAMES TO ROS BORROWERS	6,947,563	\$	648,659.95	93.37
12	TO OTHER THAN RUS BORROWERS:				
13	ADM INVESTOR SERVICES		•		
14	BP ENERGY - CAPACITY SALES		\$	(146,870.00)	
15	CALPINE ENERGY SERVICES - CAPACITY SALES				
16	CARGILL POWER MARKETS	10 000 000	•		
17	EDF TRADING	16,000,000	\$	617,600.00	38.60
18	EDF TRADING - CAPACITY SALES				
19	HMPL	84.000	¢	500 00	
20	INDIANA MUNICIPAL POWER AGENCY - CAPACITY SALES	24,000	\$	529.83	22.08
21	INDIANAPOLIS POWER & LIGHT - CAPACITY SALES		\$	75,000.00	
22	MISO	385,123,038	¢	11 595 975 00	00.05
23	MISO - CAPACITY SALES	000,120,008	\$ ¢	11,535,375.02 341,926.90	29.95
24	MORGAN STANLEY CAPITAL GROUP	60,800,000	¢ ¢	2,364,800.00	20.00
25	MORGAN STANLEY CAPITAL GROUP - CAPACITY SALES	00,800,000	φ ¢	• •	38.89
26	NEXTRA ENERGY POWER MARKETING	116,800,000	ծ Տ	113,520.00	91 90
27	NEXTRA ENERGY POWER MARKETING - CAPACITY SALES	110,000,000	ቅ \$	3,656,040.00 37,500.00	31.30
8	PJM INTERCONNECTION		φ	ə <i>1</i> ,900.00	
29	SOUTHERN ILLINOIS POWER MARKETING				
80					
81	TOTAL TO OTHER THAN RUS BORROWERS	578,747,038	\$	18,595,421.75	32.13
32		010,11,000	Ψ	10,070,421.70	32.13
3	TOTAL	585,694,601	\$	19.244.081.70	32.86
	. 2017-00006				

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Electric Utilities August 2016

1	AUGUST 2016	KWH	 AMOUNT	REVENUE \$ <u>MILLS/KWH</u>
2				
3	SPECIAL SALES TO RUS BORROWERS:			
4	WI 64-DAIRYLAND POWER COOPERATIVE - CAPACITY SALES		\$ -	
5	KY 65-KENERGY-DOMTAR COGEN	5,732,501	\$ 242,751.19	42.35
6	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP			
7	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP-CAPACITY SALES		\$ 387,500.00	
8	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP-CALL OPTION			
9				
10	TOTAL SPECIAL SALES TO RUS BORROWERS	5,732,501	\$ 630,251.19	109.94
11				
12	TO OTHER THAN RUS BORROWERS:			
13	ADM INVESTOR SERVICES		\$ (34,610.00)	
14	BP ENERGY - CAPACITY SALES			
15	CALPINE ENERGY SERVICES - CAPACITY SALES			
16	CARGILL POWER MARKETS	18,400,000	\$ 710,240.00	38.60
17	EDF TRADING			
18	EDF TRADING - CAPACITY SALES			
19	HMPL	484,000	\$ 25,409.87	52.50
20	INDIANA MUNICIPAL POWER AGENCY - CAPACITY SALES		\$ 75,000.00	
21	INDIANAPOLIS POWER & LIGHT - CAPACITY SALES			
22	MISO	372,739,347	\$ 10,896,172.90	29.23
23	MISO - CAPACITY SALES		\$ 341,926.90	
24	MORGAN STANLEY CAPITAL GROUP	68,000,000	\$ 2,642,720.00	38.86
25	MORGAN STANLEY CAPITAL GROUP - CAPACITY SALES		\$ 113,520.00	
26	NEXTRA ENERGY POWER MARKETING	112,000,000	\$ 3,581,160.00	31.97
27	NEXTRA ENERGY POWER MARKETING - CAPACITY SALES		\$ 37,500.00	
28	PJM INTERCONNECTION			
29	SOUTHERN ILLINOIS POWER MARKETING			
30				
31	TOTAL TO OTHER THAN RUS BORROWERS	571,623,347	\$ 18,389,039.67	32.17
32				
33	TOTAL	577,355,848	\$ 19,019,290.86	32.94

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Electric Utilities September 2016

1	SEPTEMBER 2016	KWH		AMOUNT	REVENUE MILLS/KW
2					
3	SPECIAL SALES TO RUS BORROWERS:				
4	WI 64-DAIRYLAND POWER COOPERATIVE - CAPACITY SALES		\$	-	
5	KY 65-KENERGY-DOMTAR COGEN	8,326,070	\$	296,121.76	35.57
6	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP		•		00101
7	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP-CAPACITY SALES		\$	387,500.00	
8	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP-CALL OPTION		+	001,000.00	
9					
10	TOTAL SPECIAL SALES TO RUS BORROWERS	8,326,070	\$	683,621.76	82.11
11		-,,	Ŧ	000,021.10	02.11
12	TO OTHER THAN RUS BORROWERS:				
13	ADM INVESTOR SERVICES		\$	74,766.00	
14	BP ENERGY - CAPACITY SALES		Ψ	11,100.00	
15	CALPINE ENERGY SERVICES - CAPACITY SALES				
16	CARGILL POWER MARKETS				
17	EDF TRADING				
18	EDF TRADING - CAPACITY SALES				
19	HMPL				
20	INDIANA MUNICIPAL POWER AGENCY - CAPACITY SALES		\$	75,000.00	
21	INDIANAPOLIS POWER & LIGHT - CAPACITY SALES		Ψ	15,000.00	
22	MISO	251,860,068	\$	9,432,860.33	37.45
23	MISO - CAPACITY SALES	,,,	\$	330,897.00	01.30
24	MORGAN STANLEY CAPITAL GROUP		Ψ	000,001.00	
25	MORGAN STANLEY CAPITAL GROUP - CAPACITY SALES				
26	NEXTRA ENERGY POWER MARKETING	177,600,000	\$	5,610,480.00	31.59
27	NEXTRA ENERGY POWER MARKETING - CAPACITY SALES	,,,,	\$	37,500.00	01.00
28	PJM INTERCONNECTION		Ŷ	01,000.00	
29	SOUTHERN ILLINOIS POWER MARKETING				
30					
81	TOTAL TO OTHER THAN RUS BORROWERS	429,460,068	\$	15,561,503.33	36.24
32		-40,100,000	Ψ	-3,001,000.00	00.24
02	TOTAL	437,786,138		16,245,125.09	37.11

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Big Rivers Electric Corporation Monthly Billing Summary Sales to Electric Utilities October 2016

1	OCTOBER 2016	KWH		AMOUNT	REVENUE MILLS/KW
2			÷		
3	SPECIAL SALES TO RUS BORROWERS:				
4	WI 64-DAIRYLAND POWER COOPERATIVE - CAPACITY SALES		\$	-	
5	KY 65-KENERGY-DOMTAR COGEN	13,806,822	\$	459,876.42	33.31
6	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP	20,000,022	¥	100,010.12	00.01
7	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP-CAPACITY SALES		\$	387,500.00	
8	IN106-HOOSIER ENERGY RURAL ELECTRIC COOP-CALL OPTION		Ψ	001,000.00	
9					
10	TOTAL SPECIAL SALES TO RUS BORROWERS	13,806,822	\$	847,376.42	61.37
11		10,000,042	Ψ	041,070.44	01.57
12	TO OTHER THAN RUS BORROWERS:				
13	ADM INVESTOR SERVICES		\$	(293,820.00)	
14	BP ENERGY - CAPACITY SALES		Ψ	(200,020.00)	
15	CALPINE ENERGY SERVICES - CAPACITY SALES				
16	CARGILL POWER MARKETS				
17	EDF TRADING				
18	EDF TRADING - CAPACITY SALES				
19	HMPL	502,000	\$	13,732.34	27.36
20	INDIANA MUNICIPAL POWER AGENCY - CAPACITY SALES	002,000	\$	75.000.00	21.50
21	INDIANAPOLIS POWER & LIGHT - CAPACITY SALES		Ψ	70,000.00	
22	MISO	324,190,256	\$	8,237,160.62	25.41
23	MISO - CAPACITY SALES	044,100,200	φ \$	341,926.90	20.41
24	MORGAN STANLEY CAPITAL GROUP		Ψ	041,020.00	
25	MORGAN STANLEY CAPITAL GROUP - CAPACITY SALES				
26	NEXTRA ENERGY POWER MARKETING	182,400,000	\$	5,697,480.00	31.24
27	NEXTRA ENERGY POWER MARKETING - CAPACITY SALES	102,100,000	φ \$	37,500.00	01.24
28	PJM INTERCONNECTION		Ψ	01,000.00	
29	SOUTHERN ILLINOIS POWER MARKETING				
30					
31	TOTAL TO OTHER THAN RUS BORROWERS	507,092,256	\$	14,108,979.86	27.82
32		001,002,200	φ	14,100,070.00	41.04
33	TOTAL	520,899,078	\$	14,956,356.28	28.71

Attachment for Response to PSC 1-12 Witness: Nicholas R. Castlen

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AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 13)	
2		a. Provide a schedule of the calculation of the 12-month
3		average line loss by month for November 2014 through
4		October 2016.
5		b. Describe the actions that Big Rivers has taken to reduce
6		line loss during this period.
7		
8	Response)	
9		a. Please see the table attached to this response for calculations of
10		the 12-month average line losses for November 2014 through
11		October 2016.
12		b. As a normal course of business, Big Rivers plans and operates its
13		transmission system in a manner that minimizes line losses. No
14		specific actions were deemed necessary to further reduce system
15		losses during the period from November 2014 through October
16		2016.
17		
18		
19	Witnesses)	Nicholas R. Castlen (a. only) and
20		Wayne O'Bryan (b. only)
21		

Case No. 2017-00006 Response to PSC 1-13 Witnesses: Nicholas R. Castlen (a. only) and Wayne O'Bryan (b. only) Page 1 of 1

Big Rivers Electric Corporation Case No. 2017-00006 12 Month Average Line Loss Calculation November 2014 - October 2016

	(a)	(b)	(c)	(d)
Line No.	12 Months Ended	12 Month Total kWh Sources	12 Month Total kWh Line Losses	12 Month Line Losses as a Percent of Total Sources
1	Nov-14	9,854,120,442	243,762,526	2.47%
2	Dec-14	9,851,792,720	241,766,566	2.45%
3	Jan-15	9,846,852,478	240,125,270	2.44%
4	Feb-15	9,892,650,552	241,689,556	2.44%
5	Mar-15	9,821,155,324	238,243,763	2.43%
6	Apr-15	9,574,662,231	237,511,371	2.48%
7	May-15	9,799,563,728	237,212,923	2.42%
8	Jun-15	10,066,188,049	237,153,638	2.36%
9	Jul-15	10,016,776,752	236,839,397	2.36%
10	Aug-15	9,825,360,885	237,831,999	2.42%
11	Sep-15	9,621,228,268	226,809,935	2.36%
12	Oct-15	9,450,107,383	223,430,334	2.36%
13	Nov-15	9,208,739,241	215,330,620	2.34%
14	Dec-15	9,027,484,832	204,296,486	2.26%
15	Jan-16	8,997,669,717	199,344,613	2.22%
16	Feb-16	9,007,914,486	194,465,756	2.16%
17	Mar-16	8,991,194,787	189,155,496	2.10%
18	Apr-16	9,190,648,366	188,246,585	2.05%
19	May-16	9,237,564,819	200,072,750	2.17%
20	Jun-16	9,095,610,728	201,213,260	2.21%
21	Jul-16	9,194,038,162	205,734,243	2.24%
22	Aug-16	9,368,497,715	208,833,531	2.23%
23	Sep-16	9,536,602,885	226,892,924	2.38%
24	Oct-16	9,695,927,260	238,748,988	2.46%

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 14)	List Big Rivers' scheduled, actual, and forced outages between
2	May 1, 2016	, and October 31, 2016.
3		
4	Response)	Please see the attached schedule for the information requested on
5	scheduled ("S	S"), actual ("A"), and forced ("F") outages.
6		
7		
8	Witness)	Jason C. Burden
9		

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Case No. 2017-00006 Response to PSC 1-14 Witness: Jason C. Burden Page 1 of 1

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Big Rivers Electric Corporation **Reid Station Unit #1 - Coal - 65MW Net** May 1, 2016 thru October 31, 2016

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Schedule vs. Actual

	Γ		MAINTENANCE						
		Sched	Scheduled		Actual		OF DUR	ATION	REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED
MONTH	TYPE	FROM	то	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE
May		No Outages							Following MISO approval of the Attachment Y Suspension Notice, Reid Unit 1 was idled effective April 1, 2016, and has not yet been restarted.
June		No Outages							
July		No Outages							
August		No Outages							
September		No Outages							
October		No Outages							

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 1 of 17

Big Rivers Electric Corporation

Schedule vs. Actual

Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net May 1, 2016 thru October 31, 2016

	L		MAIN	FENANCE				REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED
MONT		Sched		A	ctual	HOURS OF DURA	ATION	
MONTH	TYPE	FROM	TO	FROM	ТО	Scheduled Forced	Actual	OUTAGE AS APPROPRIATE
May				>	>	744:00		The unit was removed from reserve standby status on September 24, 2015, at 07:45 to allow testing of the generator and voltage regulator. Testing revealed a shorted field winding and the generator was disassembled to send the field for repairs.
June	F			6/1/2016 0:00	6/10/2016 9:32	225:32		The unit was tied on line following extensive generator repairs. The unit was out of service a total of 6,241 hours and 47 minutes.
July	F			7/21/2016 17:00	7/22/2016 12:12	19:12		A starting failure was declared when the unit did not ti on line within the allotted fifteen minute time limit. A problem with the generator breaker was corrected and the unit was returned to service.
	F			7/22/2016 15:27	7/22/2016 16:10	0:43		The unit tripped off line due to low fuel flow that caused a flame out. The fuel flow problem was corrected and the unit returned to service.
	F	-		7/22/2016 16:25	7/22/2016 18:18	1:53		The unit tripped off line due to a short in the generator charging breaker. The breaker was repaired an the uni returned to service.
	F			7/22/2016 19:05	7/25/2016 10:23	63:18		A starting failure was declared when the unit did not the on line within the allotted fifteen minute time limit. A problem with the generator breaker was corrected and the unit was returned to service.

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 2 of 17

Big Rivers Electric Corporation

Schedule vs. Actual

Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net May 1, 2016 thru October 31, 2016

			MAIN	TENANCE					REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED	
MONT			reduled		ctual	HOURS	OF DUR	ATION		
MONTH	TYPE	FROM	TÖ	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE	
July	F			7/27/2016 12:49	7/27/2016 14:13		1:24		The unit tripped off line due to high vibration on number three bearing. Believing the probe to be faulty	
	F			7/27/2016 14:42	7/28/2016 14:18		23:36		it was switched with the probe from bearing number two and the unit was returned to service. The unit tripped off line due to high vibration on number two bearing. Verifying the probe to be faulty new vibration probe was purchased and installed.	
August	S,A	8/3/2016 8:00	8/3/2016 12:00	8/3/2016 8:00	8/3/2016 11:48	4:00		3:48	The unit was removed from reserve standby status to	
	F			8/4/2016 12:56	8/5/2016 13:51		24:55		replace the generator breaker. The unit tripped off line due to a faulty fire alarm sensor that discharged the fire protection CO_2 system.	
	S,A	8/13/2016 10:00	8/30/2016 10:00	8/13/2016 10:00	8/30/2016 15:30	408:00		413:30	There was no fire so the faulty sensor was replaced and the fire protection system was recharged. The unit was removed from reserve standby status to repair hydrogen leaks on the generator.	
September	F			9/6/2016 14:12	9/6/2016 15:06		0:54		A starting failure was declared when the unit did not tie on line within the allotted fifteen minute time limit. A problem with the generator breaker was corrected and the unit was returned to service.	
	F			9/6/2016 15:54	9/6/2016 16:39		0:45		The unit tripped off line due to a control system failure. Technicians found a blown fuse in the control I/O module. The fuse was replaced an the unit returned to service.	
	S,A	9/8/2016 0:00	>	9/8/2016 0:00	>	552:00		552:00	The unit was removed from reserve standby status to repair hydrogen leaks on the generator.	

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 3 of 17

Big Rivers Electric Corporation

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Schedule vs. Actual

Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net May 1, 2016 thru October 31, 2016

			MAINTENANCE				0.0.0.0.00		REASON FOR DEVIATION FROM SCHEDULED
			duled	Ac	Actual		OF DURA	ATION	MAINTENANCE OR REASON FOR FORCED
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE
October	S,A	>	10/3/2016 0:00	>	10/3/2016 11:05	48:00		59:05	The unit was removed from reserve standby status to repair hydrogen leaks on the generator.
	F			10/18/2016 11:46	10/18/2016 16:05		4:19		A starting failure was declared when the unit did not tie on line within the allotted fifteen minute time limit. A defective solenoid valve on the compressor inlet guide vanes caused the starting delay. The solenoid was replaced an the unit was returned to service.
	F			10/18/2016 16:06	10/18/2016 16:38		0:32		The unit tripped off line due to a high atomizing air temperature alarm. The alarm was cleared and the unit was returned to service.

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 4 of 17

Big Rivers Electric Corporation Henderson Station II - Unit #1 - Coal - 153MW Net May 1, 2016 thru October 31, 2016

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Schedule vs. Actual

			MAIN	FENANCE		HOIDS			REASON FOR DEVIATION FROM SCHEDULED
			eduled	A	Actual		OF DUR	ATION	MAINTENANCE OR REASON FOR FORCED
MONTH	TYPE	FROM	ŤO	FROM	ТО	Scheduled	Forced	Actual	
May	S,A	>	>	>	>	744:00		744:00	On April 29, 2016, at 23:54 the unit was removed from service for a fifty-two day planned maintenance outage All maintenance was completed and the unit was returned to service on June 19, 2016, at 17:54, thirty hours ahead of schedule.
June	S,A	>	6/20/2016 0:00	>	6/19/2016 17:54	456:00		449 :54	On April 29, 2016, at 23:54 the unit was removed from service for a fifty-two day planned maintenance outage All maintenance was completed and the unit was returned to service on June 19, 2016, at 17:54, thirty hours ahead of schedule.
	F			6/20/2016 22:34	6/21/2016 20:14		21:40		During restart of the unit on June 19, 2016, "A" Boiler Feed Pump would not start. The unit was removed from service to isolate the pump for repairs.
July	F			7/2/2016 0:28	7/4/2016 22:40		70:12		The unit was removed from service to wash the air heaters. The air heater steam cleaning device condensate traps and warm up valves malfunctioned causing the air heater heat exchange media to fill with ash.

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 5 of 17

Big Rivers Electric Corporation Henderson Station II - Unit #1 - Coal - 153MW Net May 1, 2016 thru October 31, 2016

Schedule vs. Actual

			MAINTENANCE				ODDID	mon	REASON FOR DEVIATION FROM SCHEDULED	
		States of the state of the stat	eduled	No. of Concession, Name of	tual	HOURS	OF DURA	ATION	MAINTENANCE OR REASON FOR FORCED	
MONTH	TYPE	FROM	ТО	FROM	ТО	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE	
August	F			8/15/2016 18:05	8/25/2016 17:11		239:06		The unit tripped off line due to a leak in the economizer inlet header drain line.	
	\mathbf{F}			8/25/2016 20:39	8/26/2016 7:17		10:38		The unit was removed from service to repair a leak in	
	F			8/26/2016 8:24	8/26/2016 9:44		1:20		the number four heater access door. The unit tripped off line due to high drum level. The operator was ramping up load following the previous outage and when the second pulverizer came on line it caused the pressure to swing resulting in the high drum level trip.	
September	S,A	9/28/2016 0:00	10/1/2016 0:00	9/27/2016 23:51	9/30/2016 16:00	72:00		64:09	The unit was removed from service to repair leaks in the SCR bypass damper seal air piping. The repairs were completed and the unit was placed in reserve standby status due to economics for an additional 55:09. Total time off line was 119:18.	
October	F			10/2/2016 23:39	10/3/2016 0:49		1:10		The unit tripped offline due to low drum level. The level in the drum gage glass dropped below the bottom port and the supervisor tripped the unit.	
	F			10/5/2016 0:32	10/10/2016 1:04		120:32		The unit was removed from service to investigate inadequate NOx removal. Inspection revealed that the "B" side diverter damper was only 2% open. The damper shaft drive pins were sheared and required replacement.	

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 6 of 17

Big Rivers Electric Corporation Henderson Station II - Unit #2 - Coal - 159MW Net May 1, 2016 thru October 31, 2016

Schedule vs. Actual

			MAIN	TENANCE		HOLDGODDE		REASON FOR DEVIATION FROM SCHEDULED
			duled	A	ctual	HOURS OF DURA	ATION	MAINTENANCE OR REASON FOR FORCED
MONTH	TYPE	FROM	ŤŎ	FROM	ТО	Scheduled Forced	Actual	OUTAGE AS APPROPRIATE
May	F			5/13/2016 15:20	5/16/2016 23:53	80:33		The unit was removed from service due to plugged trays in the scrubber.
	F			5/18/2016 1:29	5/18/2016 8:59	7:30		The unit was removed from service because the scrubber had tripped. The 480 Volt motor control center that feeds power to the scrubber equipment tripped due to a short in one of the breakers causing the scrubber to trip. The short circuit was repaired an the unit was returned to service.
	F			5/18/2016 11:05	5/18/2016 12:02	0:57		The unit tripped off line due to high drum level caused by a boiler upset.
June	F			6/3/2016 16:26	6/7/2016 2:06	81:40		The unit was removed from service to repair a tube leak
	F			6/21/2016 7:31	6/27/2016 6:24	142:53		in the reheater section of the boiler. The unit was removed from service to repair a tube leak in the reheater section of the boiler.
July		No Outages						
August	F			8/16/2016 15:07	8/16/2016 20:39	5:32		The unit tripped off line due to the generator field breaker opened. An operator was working in the area and caused the field breaker to trip.
	F			8/16/2016 21:08	8/16/2016 21:50	0:42		The unit tripped off line due to high drum level caused by a boiler upset.

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 7 of 17

Big Rivers Electric Corporation Henderson Station II - Unit #2 - Coal - 159MW Net May 1, 2016 thru October 31, 2016

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Schedule vs. Actual

			MAIN	TENANCE		HOLDS	OBDIT		REASON FOR DEVIATION FROM SCHEDULED		
		Schedu	led	Ac	tual	HOURS	OF DUR.	ATION	MAINTENANCE OR REASON FOR FORCED		
MONTH	TYPE	FROM	ТО	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE		
September	F			9/8/2016 9:51	9/8/2016 22:27		12:36		The unit tripped off line when the turbine mechanical		
	F			9/8/2016 22:28	9/9/2016 5:23		6:55		verspeed heim joint broke. The unit tripped off line due to the turbine first stage nlet and reheat inlet differential pressure switch nalfunctioned.		
October	F			10/6/2016 17:58	10/7/2016 0:16		6:18		The unit tripped off line due to a short circuit in the wires leading to the sudden pressure relay (63GT3) on the main generator step up transformer.		
	F			10/20/2016 0:43	10/31/2016 0:55		264:12		The unit was removed from service to replace the slag grinders beneath the boiler.		
	F			10/31/2016 1:16	10/31/2016 1:53		0:37		The unit tripped off line due to high drum level caused by a boiler upset.		
	F			10/31/2016 16:00	>		8:00		The unit was tripped off line by the sudden pressure relay (63GT3) on the main generator step up transformer. The relay had failed and had to be replaced. The unit was returned to service on November 1, 2016, at 13:04.		

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 8 of 17

Big Rivers Electric Corporation Green Station Unit #1 - Coal/Pet coke - 231MW Net May 1, 2016 thru October 31, 2016

Schedule vs. Actual

			MAIN	TENANCE		TIOTED	DI TO A		REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED
		Schedu	ıled	A	ctual	HOURS OF	DURA		
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled For	rced		OUTAGE AS APPROPRIATE
May	F			5/2/2016 19:04	5/3/2016 3:35	8:	:31		The unit tripped off line due to low drum level caused by a boiler upset.
	F			5/22/2016 13:39	5/24/2016 0:00	34	k:21		The unit tripped off line due to failure of the generator stator cooling water pump. The redundant pump was out for repair when the running pump failed. Maintenance expedited repair of the redundant pump and returned the unit to service.
June	F			6/9/2016 20:43	6/9/2016 22:35	1:	:52		The unit tripped off line due to high drum level caused by a boiler upset.
July	F			7/1/2016 13:48	7/4/2016 12:20	70	0:32		The unit tripped off line due to a flame scanner/ burner management issue. While off line the boiler was hydrostatically tested and a tube leak was discovered. When the tube leak was repaired the unit was placed in reserve standby status. The unit was returned to service on July 4, 2016, at 19:07. Total time off line was 77:19.

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 9 of 17

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Big Rivers Electric Corporation Green Station Unit #1 - Coal/Pet coke - 231MW Net May 1, 2016 thru October 31, 2016

Schedule vs. Actual

		MAINTENANCE						REASON FOR DEVIATION FROM SCHEDULED	
			eduled		tual	HOURS OF D		MAINTENANCE OR REASON FOR FORCED	
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled Force	d Actual	OUTAGE AS APPROPRIATE	
August	F			8/9/2016 8:58	8/11/2016 4:21	43:2	3	The unit was removed from service to repair tube leaks in the reheater and superheater sections of the boiler.	
	F			8/15/2016 17:35	8/16/2016 0:12	6:37		The unit tripped off line due to an issue with the generator or voltage regulator. Following an extensive investigation the root cause of the failure was not determined and the unit was returned to service.	
	F			8/26/2016 21:14	8/29/2016 23:34	74:20)	The unit was removed from service to repair a tube leak in the reheater section of the boiler.	
September	S,A	9/4/2016 0:00	9/6/2016 0:00	9/4/2016 2:13	9/5/2016 20:28	48:00	42:15	The unit was removed from service due to weak power market conditions and placed in reserve standby status.	
	S,A	9/30/2016 0:00	>	9/30/2016 1:04	>	24:00	22:56	The unit was removed from service due to weak power market conditions and placed in reserve standby status.	
October	S,A	>	10/2/16 12:00	>	10/2/2016 17:03	36:00	41:03	The unit was removed from service due to weak power market conditions and placed in reserve standby status.	
	F			10/26/2016 19:25	10/30/2016 1:01	77:36	;	The unit was removed from service to repair a tube leak in the reheater section of the boiler.	

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 10 of 17

Big Rivers Electric Corporation Green Station Unit #2 - Coal/Pet coke - 223MW Net May 1, 2016 thru October 31, 2016 Schedule vs. Actual

			MAINT	ENANCE		HOLDO		 REASON FOR DEVIATION FROM SCHEDULED
		Sche	duled	A	Actual		OF DURA	MAINTENANCE OR REASON FOR FORCED
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled	Forced	OUTAGE AS APPROPRIATE
May		No Outages						
June	F			6/9/2016 2032	6/10/2016 0650		10:18	The unit tripped off line due to low furnace pressure that was caused by the loss of control power to all of th fan dampers. Power was restored an the unit was returned to service.
July	F			7/7/2016 18:27	7/11/2016 18:44		96:17	The unit tripped off line due to a tube leak in the east side water wall at elevation 496' 1".
	F			7/15/2016 1:24	7/15/2016 4:36		3:12	The unit tripped off line due to high furnace pressure when the pin fell out of "B" ID Fan inlet damper linkage allowing the dampers to slam shut.
August		No Outages						

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 11 of 17

Big Rivers Electric Corporation Green Station Unit #2 - Coal/Pet coke - 223MW Net May 1, 2016 thru October 31, 2016

Schedule vs. Actual

			MAIN	TENANCE	· · · · · · · · · · · · · · · · · · ·	TIOTIDO	07 D.T.		REASON FOR DEVIATION FROM SCHEDULED	
			neduled	A	ctual	HOURS	OF DUR.	ATION	MAINTENANCE OR REASON FOR FORCED	
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE	
September	S,A	9/4/2016 0:00	9/6/16 0:00	9/4/2016 1:11	9/6/2016 3:29	48:00		50:18	The unit was removed from service due to weak market conditions (economics) and placed in reserve standby status. Upon performing a hydrostatic test of the boiler a waterwall tube leak was discovered in the west side water wall and the unit was removed from reserve standby at 13:00 on September 4, 2016, for repairs. Repairs were completed and the unit was returned to reserve standby at 12:00 on September 5, 2016.	
	S,A	9/28/2016 0:00	>	9/28/2016 1:15	>	72:00		70:45	The unit was removed from service due to weak market conditions (economics) and placed in reserve standby status. The unit was removed from reserve standby at 09:00 on October 1, 2016, and placed in maintenance outage status to accommodate a boiler operating permit inspection. The inspection was completed and the unit was returned to reserve standby at 11:45 on October 1, 2016.	

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 12 of 17

Big Rivers Electric Corporation Green Station Unit #2 - Coal/Pet coke - 223MW Net May 1, 2016 thru October 31, 2016

Schedule vs. Actual

-			MAINT	ENANCE		TIOTIDO		1000	REASON FOR DEVIATION FROM SCHEDULED	
			Scheduled		ctual	HOURS	OF DUR.	ATION	MAINTENANCE OR REASON FOR FORCED	
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE	
October	S,A	>	10/4/2016 0:00	>	10/3/2016 22:33	72:00		70:33	The unit was removed from service due to weak market conditions (economics) and placed in reserve standby status. The unit was removed from reserve standby at 09:00 on October 1, 2016, and placed in maintenance outage status to accommodate a boiler operating permit inspection. The inspection was completed and the unit was returned to reserve standby at 11:45 on October 1, 2016.	
	F			10/5/2016 8:22	10/5/2016 14:20		5:58		The unit was removed from service to investigate two loose metal rods inside the generator exciter that were detected by an electrician while performing preventive maintenance work. Two of the rods that support a fiber screen over the exciter diode shroud came loose on one end and were vibrating. It appears that the securing weld cracked from fatigue and liberated one end of the rods.	
	S,A	10/23/2016 0:00	10/31/2016 0:00	10/23/2016 0:56	10/30/2016 19:50	192:00		186:54	'The unit was removed from service due to weak market conditions (economics) and placed in reserve standby status.	

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 13 of 17

Big Rivers Electric Corporation Coleman Station Unit #1 - Coal - 150MW Net May 1, 2016 thru October 31, 2016

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Schedule vs. Actual

			MAINTE	NANCE		HOIDO		REASON FOR DEVIATION FROM SCHEDULED
			Scheduled		Actual		OF DURATIO	MAINTENANCE OR REASON FOR FORCED
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled	Forced Act	tual OUTAGE AS APPROPRIATE
Мау		No Outages						Coleman Unit 1 was idled on May 1, 2014, and has not yet been returned to service.
June		No Outages						
July		No Outages						
August		No Outages						
September		No Outages						
October		No Outages				-		

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Big Rivers Electric Corporation Coleman Station Unit #2 - Coal - 138MW Net May 1, 2016 thru October 31, 2016 Schedule vs. Actual

			MAINTENANCE				OF DUR		REASON FOR DEVIATION FROM SCHEDULED	
			Scheduled		Actual		_		MAINTENANCE OR REASON FOR FORCED	
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE	
May		No Outages							Coleman Unit 2 was idled on May 1, 2014, and has not yet been returned to service.	
June		No Outages								
July		No Outages								
August		No Outages								
September		No Outages								
October		No Outages								

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Big Rivers Electric Corporation Coleman Station Unit #3 - Coal - 155MW Net May 1, 2016 thru October 31, 2016

Schedule vs. Actual

-		MAINTENANCE					OTIDIT		REASON FOR DEVIATION FROM SCHEDULED	
			duled	Actual		HOURS	OF DUR	ATION	MAINTENANCE OR REASON FOR FORCED	
MONTH	TYPE	FROM	TO	FROM	TO	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE	
May		No Outages							Coleman Unit 3 was idled on May 8, 2014, and has not yet been returned to service.	
June		No Outages								
July		No Outages								
August		No Outages								
September		No Outages								
October		No Outages								

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 16 of 17

Big Rivers Electric Corporation Wilson Station - Unit #1 - Coal/Pet Coke - 417MW Net May 1, 2016 thru October 31, 2016 Schedule vs. Actual

			MAIN	ENANCE					REASON FOR DEVIATION FROM SCHEDULED
			eduled	Ac	tual	HOURS	OF DUR	ATION	MAINTENANCE OR REASON FOR FORCED
MONTH	TYPE	FROM	TO	FROM	ТО	Scheduled	Forced	Actual	OUTAGE AS APPROPRIATE
Мау	F			>	5/2/2016 5:42		29:42		The unit was removed from service at 00:36 on April 30, 2016, to repair a water wall tube leak on the west side wall.
June	F			6/25/2016 21:11	6/28/2016 1:01		51:50		The unit was removed from service to repair a water wall tube leak in the boiler nose area.
July	F			7/4/2016 12:24	7/4/2016 18:39		6:15		The unit tripped off line due to a lightening strike in the switchyard. The electrical surge activated the 86GP-1 protective relay that tripped the unit.
August		No Outages							
September	S,A	9/4/2016 0:00	9/5/2016 6:00	9/4/2016 1:00	9/5/2016 6:09	30:00		29:09	"The unit was removed from service due to weak market conditions (economics) and placed in reserve standby status.
	S,A	9/14/2016 0:00	9/19/2016 0:00	9/13/2016 23:18	9/18/2016 16:16	120:00		112:58	The unit was removed from service to repair a steam leak on HMV-170 steam isolation valve, wash the primary air heaters and perform scrubber maintenance.
October	F			10/30/2016 20:09	>		27:51		The unit was removed from service to repair a water wall tube leak on the west side wall. The unit was returned to service on November 1, 2016, at 15:18.

Case No. 2017-00006 Attachment for Response to PSC 1-14 Witness: Jason C. Burden Page 17 of 17

AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1	Item 15)	For each existing fuel contract categorized as long-term (i.e.,
2	one year of	r more in length), provide:
3		
4		a. Supplier's name and address;
5		b. Name and location of production facility;
6		c. Date when contract was executed;
7		d. Duration of contract;
8		e. Date(s) of each contract revision, modification, or
9		amendment;
10		f. Annual tonnage requirements;
11		g. Actual annual tonnage received since the contract's
12		inception;
13		h. Percent of annual requirements received during the
14		contract's term;
15		i. Base price in dollars per ton;
16		j. Total amount of price escalations to date in dollars per ton;
17		and
18		k. Current price paid for coal under the contract in dollars
19		per ton $(i + j)$.
20		
21	Response)	Please see the attached schedules for the list of existing fuel
22	contracts for	r the period from May 1, 2016, through October 31, 2016.
23		
24	Witness)	Mark W. McAdams

Case No. 2017-00006 Response to PSC 1-15 Witness: Mark W. McAdams Page 1 of 1

Sebree Mining – BRE-11-002

A. NAME / ADDRESS:	Sebree Mining, LLC 1717 South Boulder A Tulsa, OK 74119	(formerly Allied Resources) Avenue
B. PRODUCTION FACILITY:	Onton No. 9 Mine, Do Webster and Union C	tiki Mine, River View Mine ounties, Kentucky
C. CONTRACT EXECUTED DATE:	June 18, 2010	
D. CONTRACT DURATION:	January 1, 2011 throw	ugh December 31, 2016
E. CONTRACT AMENDMENTS:	April 29, 2011 November 17, 2011 March 29, 2012	(Amendment One) (Amendment Two) (Contract Assigned from Allied resources to Sebree Mining, LLC)
	August 12, 2013	(Amendment Three)
	January 8, 2014	(Amendment Four)
	February 14, 2014 March 1, 2016	(Amendment Five) (Amendment Six)
	March 1, 2010	(Amenament Six)
F. ANNUAL TONNAGE	2011 – 250,00	
REQUIREMENTS:	2012 - 750,00	
	2013 - 960,00	
	2014 - 800,00 2015 - 838,00	0 tons (176,700 tons Force
	2016 – 952,00	Majeure)
G. ACTUAL TONNAGE:	2011 – 240,65	0 tons
	2012 – 748,12	
	2013 – 919,42	6 tons
	2014 – 838,34	
	2015 - 661,79	6 tons (176,700 tons Force Majeure)
	2016 – 781,72	9 tons (through October)
H. PERCENT OF ANNUAL	2011 - 96.26 9	%
REQUIREMENTS:	2012 - 99.75	%
	2013 - 95.77 9	
	2014 - 104.79	
	2015 - 100.089	
	2016 - 82.119	% (through October)

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Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 1 of 10

Sebree Mining - BRE-11-002 (continued)

I. BASE PRICE:

Sebree Complex - \$ 50.5308 per ton Quality A 2011 Quality B 2011 - \$ 48.6790 per ton Quality C 2011 - \$ 47.1086 per ton Quality D 2011 - \$ 44.2420 per ton Quality A 2012 - \$ 52.5500 per ton - \$ 50.6259 per ton Quality B 2012 Quality C 2012 - \$ 48.9946 per ton Quality D 2012 - \$ 46.0108 per ton – \$ 54.9153 per ton Quality A 2013 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 - \$ 55.6405 per ton Quality B 2014

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

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 2 of 10

Sebree Mining – BRE-11-002 (continued)

		<i>a</i> 1		a	
BASE PRICE: (continuea)					
	Quanty A 2011	-	\$	59.4325	per ton
		<u>Stea</u>	m	ort Dock	
	Quality A 2011	-	\$	49.9335	per ton
	Quality B 2011	_	\$	48.0800	per ton
	Quality C 2011	_	\$	46.5083	per ton
	Quality D 2011	-	\$	43.6414	per ton
	Quality A 2012	_			per ton
	• •	—			per ton
		-			per ton
	Quality D 2012	-	\$	45.4102	per ton
	Quality A 2013	-	\$	54.3204	per ton
	Quality B 2013				per ton
	Quality C 2013	_	\$	51.4303	per ton
	Quality D 2013	-	\$	48.4308	per ton
	Quality A 2014				per ton
	Quality B 2014	—	\$	55.0415	per ton
	Quality C 2014	—	\$		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
	•	—	\$	59.4090	per ton
	Quality D 2016	_	\$	56.5598	per ton
	Quality A -	Dotik	ri A	Aine: <u>Sebr</u>	<u>ree Complex</u>
	2016	_			per 52k tons
	2016	—	\$	62.8570	per ton
		<u>ty C</u> -			
	2016	_	\$	56.7594	per ton
	BASE PRICE: (continued)	Quality A 2011 Quality A 2011 Quality B 2011 Quality C 2011 Quality D 2011 Quality A 2012 Quality A 2012 Quality C 2012 Quality C 2012 Quality A 2013 Quality A 2013 Quality C 2013 Quality C 2013 Quality A 2014 Quality B 2014 Quality D 2014 Quality C 2014 Quality A 2015 Quality A 2015 Quality C 2015 Quality C 2015 Quality C 2015 Quality C 2015 Quality C 2016 Quality C 2016 Quality C 2016 Quality D 2016	Quality A 2011 - Quality A 2011 - Quality B 2011 - Quality C 2011 - Quality D 2011 - Quality D 2011 - Quality D 2012 - Quality D 2012 - Quality D 2012 - Quality D 2012 - Quality D 2013 - Quality D 2014 - Quality D 2014 - Quality D 2015 - Quality D 2015 - Quality D 2015 - Quality D 2015 - Quality D 2016 - Quality D 2016 - Quality D 2016 - Quality D 2016 - Quality C 2016 - <td>Quality A 2011 - \$ Quality A 2011 - \$ Quality B 2011 - \$ Quality C 2011 - \$ Quality D 2012 - \$ Quality D 2013 - \$ Quality D 2014 - \$ Quality D 2014 - \$ Quality D 2014 - \$ Quality D 2015 - \$ Quality D 2015 - \$ Quality D 2016 - \$ Quality D 2016 - \$ Quality D 2016</td> <td>Quality A 2011-\$ 59.4325Steamport DockQuality A 2011-\$ 49.9335Quality B 2011-\$ 48.0800Quality C 2011-\$ 46.5083Quality D 2011-\$ 43.6414Quality A 2012-\$ 51.9551Quality B 2012-\$ 50.0269Quality D 2012-\$ 48.3943Quality D 2012-\$ 45.4102Quality D 2012-\$ 45.4102Quality D 2013-\$ 54.3204Quality D 2013-\$ 54.3204Quality D 2013-\$ 51.4303Quality D 2013-\$ 51.4303Quality D 2013-\$ 55.0415Quality D 2013-\$ 55.0415Quality D 2014-\$ 55.0415Quality D 2014-\$ 55.0705Quality D 2015-\$ 53.5832Quality D 2015-\$ 53.5832Quality D 2015-\$ 53.5832Quality D 2016-\$ 59.4090Quality D 2016-\$ 59.4090Quality D 2016-\$ 56.5588Quality D 2016-\$ 61.32742016-\$ 61.32742016-\$ 62.8570Quality C - River View</td>	Quality A 2011 - \$ Quality A 2011 - \$ Quality B 2011 - \$ Quality C 2011 - \$ Quality D 2012 - \$ Quality D 2013 - \$ Quality D 2014 - \$ Quality D 2014 - \$ Quality D 2014 - \$ Quality D 2015 - \$ Quality D 2015 - \$ Quality D 2016 - \$ Quality D 2016 - \$ Quality D 2016	Quality A 2011-\$ 59.4325Steamport DockQuality A 2011-\$ 49.9335Quality B 2011-\$ 48.0800Quality C 2011-\$ 46.5083Quality D 2011-\$ 43.6414Quality A 2012-\$ 51.9551Quality B 2012-\$ 50.0269Quality D 2012-\$ 48.3943Quality D 2012-\$ 45.4102Quality D 2012-\$ 45.4102Quality D 2013-\$ 54.3204Quality D 2013-\$ 54.3204Quality D 2013-\$ 51.4303Quality D 2013-\$ 51.4303Quality D 2013-\$ 55.0415Quality D 2013-\$ 55.0415Quality D 2014-\$ 55.0415Quality D 2014-\$ 55.0705Quality D 2015-\$ 53.5832Quality D 2015-\$ 53.5832Quality D 2015-\$ 53.5832Quality D 2016-\$ 59.4090Quality D 2016-\$ 59.4090Quality D 2016-\$ 56.5588Quality D 2016-\$ 61.32742016-\$ 61.32742016-\$ 62.8570Quality C - River View

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 3 of 10

Sebree Mining – BRE-11-002 (continued)

J. ESCALATIONS TO DATE:

None

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		\$		per ton			
Quality C 2014	-		53.8706	per ton			
Quality D 2014	_	\$		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			
<u>Steamport Dock</u>							
Onality A 9012	<u>sieu</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			
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 –	Dotil	ki I	Aine: Sebi	ree Complex			
2016	_		61.3274	per 52k tons			
2016	_	\$	62.8570	per ton			
	C			•			
	ty C -		<u>iver View</u>				
2016	_	\$	56.7594	per ton			

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 4 of 10

Foresight – BRE-15-005

A. NAME / ADDRESS:	Foresight Coal Sales, LLC 211 North Broadway, Suite 2600 St. Louis, MO 63102
B. PRODUCTION FACILITY:	Deer Run and/or Shay No. 1 in Montgomery and Macoupin, Illinois.
C. CONTRACT EXECUTED DATE:	March 6, 2015
D. CONTRACT DURATION:	February 6, 2015 through December 31, 2019
E. CONTRACT AMENDMENTS:	None
F. ANNUAL TONNAGE REQUIREMENTS:	$\begin{array}{rrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrr$
G. ACTUAL TONNAGE:	2015 – 200,318 tons 2016 – 217,569 tons (through October)
H. PERCENT OF ANNUAL REQUIREMENTS:	2015 – 100.16 % 2016 – 90.65 % (through October)
I. BASE PRICE:	2015-\$ 34.0006per ton2016-\$ 36.2491per ton2017-\$ 38.4998per ton2018-\$ 40.5497per ton2019-\$ 42.3490per ton
J. ESCALATIONS TO DATE:	None
K. CURRENT CONTRACT PRICE:	2015 – \$ 34.0006 per ton 2016 – \$ 36.2491 per ton

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 5 of 10

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#### KenAmerican Resources - BRE-15-006

| A. NAME / ADDRESS:                    | KenAmerican Resources, Inc.<br>46226 National Road<br>St. Clairsville, OH 43950 |  |  |  |  |  |
|---------------------------------------|---------------------------------------------------------------------------------|--|--|--|--|--|
| <b>B. PRODUCTION FACILITY:</b>        | Paradise #9 Mine<br>Muhlenberg County, Kentucky                                 |  |  |  |  |  |
| C. CONTRACT EXECUTED DATE:            | January 30, 2015                                                                |  |  |  |  |  |
| D. CONTRACT DURATION:                 | January 1, 2015 through December 31, 2019                                       |  |  |  |  |  |
| E. CONTRACT AMENDMENTS:               | None                                                                            |  |  |  |  |  |
| F. ANNUAL TONNAGE<br>REQUIREMENTS:    | $\begin{array}{rrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrr$                            |  |  |  |  |  |
| G. ACTUAL TONNAGE:                    | 2015 – 300,077 tons<br>2016 – 417,408 tons (through October)                    |  |  |  |  |  |
| H. PERCENT OF ANNUAL<br>REQUIREMENTS: | 2015 – 100.03 %<br>2016 – 83.48 % (through October)                             |  |  |  |  |  |
| I. BASE PRICE:                        | $\begin{array}{rrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrr$                            |  |  |  |  |  |
| J. ESCALATIONS TO DATE:               | None                                                                            |  |  |  |  |  |
| K. CURRENT CONTRACT PRICE:            | 2015 – \$ 49.2505 per ton<br>2016 – \$ 50.5000 per ton                          |  |  |  |  |  |

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 6 of 10

# Rhino Energy LLC and Pennyrile Energy LLC Coal Sales - BRE-15-009

| A. | NAME / ADDRESS:                 | Rhino Energy LLC/Pennyrile Energy, LLC.<br>424 Lewis Hargett Circle, Suite 250<br>Lexington, KY 40503 |                                                        |  |  |  |  |
|----|---------------------------------|-------------------------------------------------------------------------------------------------------|--------------------------------------------------------|--|--|--|--|
| B. | PRODUCTION FACILITY:            | Pennyrile Energy LLC<br>Riveredge Mine<br>McLean County, Kentucl                                      | ٤y                                                     |  |  |  |  |
| C. | CONTRACT EXECUTED DATE:         | March 16, 2015                                                                                        |                                                        |  |  |  |  |
| D. | CONTRACT DURATION:              | March 16, 2015 through De                                                                             | ecember 31, 2018                                       |  |  |  |  |
| E. | CONTRACT AMENDMENTS:            | June 1, 2016                                                                                          | (Amendment One)                                        |  |  |  |  |
| F. | ANNUAL TONNAGE<br>REQUIREMENTS: | 2015 – 105,000                                                                                        | tons (Start date for tonnage<br>delivery June 1, 2015) |  |  |  |  |
|    |                                 | 2016 – 350,000                                                                                        | tons                                                   |  |  |  |  |
|    |                                 | 2017 - 450,000                                                                                        | tons                                                   |  |  |  |  |
|    |                                 | 2018 – 150,000                                                                                        | tons                                                   |  |  |  |  |
| G. | ACTUAL TONNAGE:                 | 2015 - 105,260                                                                                        | tons                                                   |  |  |  |  |
|    |                                 | 2016 – 333,266                                                                                        | tons (through October)                                 |  |  |  |  |
| H. | PERCENT OF ANNUAL               | 2015 - 100.25 %                                                                                       |                                                        |  |  |  |  |
|    | <b>REQUIREMENTS</b> :           | 2016 - 95.22 %                                                                                        | (through October)                                      |  |  |  |  |
| I. | BASE PRICE:                     | Riveredge 2015 –                                                                                      | \$ 43.7490 per ton                                     |  |  |  |  |
|    |                                 | -                                                                                                     | \$ 45.7498 per ton                                     |  |  |  |  |
|    |                                 | 0                                                                                                     | \$ 47.7500 per ton                                     |  |  |  |  |
|    |                                 | =                                                                                                     | \$ 47.0826 per ton                                     |  |  |  |  |
| J. | ESCALATIONS TO DATE:            | None                                                                                                  |                                                        |  |  |  |  |
| K. | CURRENT CONTRACT PRICE:         | Riveredge 2015 –                                                                                      | \$ 43.7490 per ton                                     |  |  |  |  |
|    |                                 | Riveredge 2016 –                                                                                      | \$ 45.7498 per ton                                     |  |  |  |  |

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 7 of 10

#### Alliance Coal, LLC - BRE-15-010

| A. | NAME / ADDRESS:<br>IT17 South Boulder, Suite 400<br>Tulsa, OK 74119 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |  |  |  |  |  |
|----|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|--|
| B. | PRODUCTION FACILITY:                                                | Hopkins Cty. Coal, LLC – Elk Creek Mine Facility<br>Sebree Mining, Onton No. 9 Mine Facility<br>Warrior Coal LLC Mining Operations<br>Webster Coal, LLC – Dotiki Mine Facility<br>Riverview Coal, LLC – River View Mine Facility                                                                                                                                                                                                                                                                                    |  |  |  |  |  |  |
| C. | CONTRACT EXECUTED DATE:                                             | August 10, 2015                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |  |  |  |  |  |
| D. | CONTRACT DURATION:                                                  | September 1, 2015 through December 31, 2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |  |  |  |  |  |
| E. | CONTRACT AMENDMENTS:                                                | None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |  |  |  |  |  |
| F. | ANNUAL TONNAGE<br>REQUIREMENTS:                                     | 2015 – 75,000 tons (Option tons)<br>2016 – 250,000 tons<br>2017 – 575,000 tons                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |  |  |  |  |  |
| G. | ACTUAL TONNAGE:                                                     | 2015-0tons(Option not exercised)2016-205,756tons(through October)                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |  |  |  |  |  |
| H. | PERCENT OF ANNUAL<br>REQUIREMENTS:                                  | 2015 – 0.00 % (Option not exercised)<br>2016 – 82.30 % (through October)                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |  |  |  |  |  |
| I. | BASE PRICE:                                                         | <u>Quality A (11,900 BTU/lb.) – Hopkins Elk Creek</u><br>2015 – \$ 53.2493 per ton                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |  |  |  |  |  |
|    | ·                                                                   | $\frac{Quality B (11,800 BTU/lb.) - Onton No. 9}{Warrior Coal, & Webster Coal}$ 2015 - \$ 50.8061 per ton<br>2016 - \$ 52.7649 per ton<br>2017 - \$ 54.7733 per ton<br>$\frac{Quality C (11,500 BTU/lb.) - Onton No. 9 \& River View Coal}{River View Coal}$ 2015 - \$ 45.3491 per ton<br>2016 - \$ 47.2006 per ton<br>2017 - \$ 49.0498 per ton<br>$\frac{Quality D (11,250 BTU/lb.) - Onton No. 9}{2015 - $ 45.8000 per ton}$ 2015 - \$ 45.8000 per ton<br>2016 - \$ 47.5505 per ton<br>2017 - \$ 49.4000 per ton |  |  |  |  |  |  |

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Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 8 of 10

### Alliance Coal, LLC - BRE-15-010 (continued)

I.

J.

K.

| BASE PRICE: (continued) | <u>Quality E (11,000 BTU/lb.) – Onton No. 9</u><br>2015 – \$ 44.0996 per ton<br>2016 – \$ 45.8002 per ton<br>2017 – \$ 47.5492 per ton |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| ESCALATIONS TO DATE:    | 2015 – None<br>2016 – None                                                                                                             |
| CURRENT CONTRACT PRICE: | 2015 – N/A (No option tons)                                                                                                            |
|                         | <u>Quality A (11,900 BTU/lb.) – Hopkins Elk Creek</u><br>2016 – N/A                                                                    |
|                         | <u>Quality B (11,800 BTU/lb.) – Onton No. 9.</u><br><u>Warrior Coal, &amp; Webster Coal</u><br>2016 – \$ 52.7649 per ton               |
|                         | <u>Quality C (11,500 BTU/lb.) – Onton No. 9 &amp;</u><br><u>River View Coal</u><br>2016 – \$ 47.2006 per ton                           |
|                         | <u>Quality D (11,250 BTU/lb.) – Onton No. 9</u><br>2016 – \$ 47.5505 per ton                                                           |
|                         | <u>Quality E (11,000 BTU/lb.) – Onton No. 9</u><br>2016 – \$ 45.8002 per ton                                                           |

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 9 of 10

### Peabody CoalSales - BRE-15-018

| A. NAME / ADDRESS:                    | Peabody COALSALES, LLC<br>701 Market Street<br>St. Louis, MO 63101                                            |  |  |  |  |  |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------|--|--|--|--|--|
| <b>B. PRODUCTION FACILITY:</b>        | Somerville and Wild Boar Mining Complex,<br>Surface Mining Operation,<br>Warrick and Gibson Counties, Indiana |  |  |  |  |  |
| C. CONTRACT EXECUTED DATE:            | October 1, 2015                                                                                               |  |  |  |  |  |
| D. CONTRACT DURATION:                 | January 1, 2016 through December 31, 2018                                                                     |  |  |  |  |  |
| E. CONTRACT AMENDMENTS:               | None                                                                                                          |  |  |  |  |  |
| F. ANNUAL TONNAGE<br>REQUIREMENTS:    | $2016 - 350,000 	ext{ tons}$<br>$2017 - 525,000 	ext{ tons}$<br>$2018 - 625,000 	ext{ tons}$                  |  |  |  |  |  |
| G. ACTUAL TONNAGE:                    | 2016 – 300,760 tons (through October)                                                                         |  |  |  |  |  |
| H. PERCENT OF ANNUAL<br>REQUIREMENTS: | 2016 – 85.93 % (through October)                                                                              |  |  |  |  |  |
| I. BASE PRICE:                        | 2016 – \$ 40.4998 per ton<br>2017 – \$ 40.4998 per ton<br>2018 – \$ 40.4998 per ton                           |  |  |  |  |  |
| J. ESCALATIONS TO DATE:               | None                                                                                                          |  |  |  |  |  |
| K. CURRENT CONTRACT PRICE:            | 2016 – \$ 40.4998 per ton                                                                                     |  |  |  |  |  |

Case No. 2017-00006 Attachment for Response to PSC 1-15 Witness: Mark W. McAdams Page 10 of 10

### AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 16)    | Provide a schedule of the present and proposed rates that Big      |
|----|-------------|--------------------------------------------------------------------|
| 2  | Rivers seel | ks to change pursuant to 807 KAR 5:056, shown in comparative       |
| 3  | form.       |                                                                    |
| 4  |             |                                                                    |
| 5  | Response)   | Not applicable. Please see Big Rivers' response to Item 1 of these |
| 6  | information | request.                                                           |
| 7  |             |                                                                    |
| 8  |             |                                                                    |
| 9  | Witness)    | Roger D. Hickman                                                   |
| 10 |             |                                                                    |

. .

Case No. 2017-00006 Response to PSC 1-16 Witness: Roger D. Hickman Page 1 of 1

### AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

| 1 | Item 17)     | Provide a copy of current tariff showing by cross-outs and          |
|---|--------------|---------------------------------------------------------------------|
| 2 | italicized i | nserts all proposed changes in rates.                               |
| 3 |              |                                                                     |
| 4 | Response)    | Not applicable. Please see Big Rivers' responses to Item 1 and Item |
| 5 | 16 above.    |                                                                     |
| 6 |              |                                                                     |
| 7 |              |                                                                     |
| 8 | Witness)     | Roger D. Hickman                                                    |

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Case No. 2017-00006 Response to PSC 1-17 Witness: Roger D. Hickman Page 1 of 1

### AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

 $\left( \begin{array}{c} \end{array} \right)$ 

### Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 18)  |            |        |                                                              |
|----|-----------|------------|--------|--------------------------------------------------------------|
| 2  |           | <i>a</i> . | State  | e whether Big Rivers regularly compares the price of its     |
| 3  |           |            | coal   | purchases with those paid by other electric utilities.       |
| 4  |           | <b>b</b> . | If the | e response is yes, state:                                    |
| 5  |           |            | (1)H   | ow Big Rivers' prices compare with those of the other        |
| 6  |           |            | u      | tilities for the review period. Include all prices used in   |
| 7  |           |            | tl     | he comparison in cents per MMbtu; and                        |
| 8  |           |            | (2) Tł | ne utilities that are included in this comparison and        |
| 9  |           |            | th     | eir locations.                                               |
| 10 |           |            |        |                                                              |
| 11 | Response) |            |        |                                                              |
| 12 |           | a.         | Yes,   | Big Rivers has compared the price of its coal purchases      |
| 13 |           |            | with   | n those paid by other electric utilities.                    |
| 14 |           | b.         | The    | tables and the charts accompanying this response reflect     |
| 15 |           |            | two    | non-Big Rivers events. First, Duke Energy-Kentucky re-       |
| 16 |           |            | port   | ed no April 2016 coal purchases for its East Bend location.  |
| 17 |           |            | Seco   | ond, in mid-2015, Kentucky Power's Big Sandy Unit #2 was     |
| 18 |           |            | retii  | red and Unit #1 was converted to natural gas.                |
| 19 |           |            | (1)    | Big Rivers' coal pricing is competitive with that of its     |
| 20 |           |            |        | comparison group for the review period. Attached hereto      |
| 21 |           |            |        | are tables and charts on a $\phi$ per MMBTU and showing Big  |
| 22 |           |            |        | Rivers with and without petcoke.                             |
| 23 |           |            | (2)    | Utilities that are included in this comparison are Kentucky- |
| 24 |           |            |        | based companies. These utilities are identified on the       |
| 25 |           |            |        | attached tables and charts.                                  |

Case No. 2017-00006 Response to PSC 1-18 Witness: Mark W. McAdams Page 1 of 2

### AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

### Response to Commission Staff's Request for Information dated February 6, 2017

### February 20, 2017

| 1 |          |                 |
|---|----------|-----------------|
| 2 |          |                 |
| 3 | Witness) | Mark W. McAdams |
| 4 |          |                 |

Case No. 2017-00006 Response to PSC 1-18 Witness: Mark W. McAdams Page 2 of 2

## Big Rivers Electric Corporation Case No. 2017-00006

| Cents per MMBTU (Big Rivers without Pet Coke) |               |        |               |        |        |        |  |  |
|-----------------------------------------------|---------------|--------|---------------|--------|--------|--------|--|--|
| Company                                       | <b>Nov-14</b> | Dec-14 | Jan-15        | Feb-15 | Mar-15 | Apr-15 |  |  |
| <b>Big Rivers Electric Corporation</b>        | 214.24        | 226.22 | 201.03        | 234.09 | 239.53 | 226.34 |  |  |
| Duke Energy - Kentucky <sup>1</sup>           | 213.66        | 214.39 | 215.27        | 225.74 | 224.40 | 224.40 |  |  |
| Louisville Gas and Electric Company           | 232.03        | 231.47 | 234.83        | 239.23 | 236.16 | 229.07 |  |  |
| Kentucky Utilites Company                     | 237.41        | 239.83 | 240.04        | 232.01 | 236.25 | 227.44 |  |  |
| East Kentucky Power Cooperative               | 242.70        | 246.20 | <b>235.10</b> | 233.80 | 230.90 | 228.40 |  |  |
| Kentucky Power <sup>2</sup>                   | 284.11        | 284.64 | 260.94        | 265.59 | 252.99 | 221.32 |  |  |
| Company                                       | May-15        | Jun-15 | Jul-15        | Aug-15 | Sep-15 | Oct-15 |  |  |
| <b>Big Rivers Electric Corporation</b>        | 225.59        | 235.70 | 230.02        | 226.64 | 230.95 | 226.96 |  |  |
| Duke Energy - Kentucky <sup>1</sup>           | 222.86        | 222.95 | 222.53        | 214.04 | 209.50 | 209.33 |  |  |
| Louisville Gas and Electric Company           | 223.92        | 223.11 | 229.30        | 231.93 | 222.57 | 228.39 |  |  |
| Kentucky Utilites Company                     | 228.74        | 227.63 | 216.00        | 216.61 | 227.26 | 209.25 |  |  |
| East Kentucky Power Cooperative               | 226.00        | 219.50 | 219.50        | 219.20 | 221.90 | 227.90 |  |  |
| Kentucky Power <sup>2</sup>                   | 220.04        | 219.59 | 207.77        | 206.03 | 194.38 | 206.13 |  |  |

Note(s):

1.- Duke Energy-Kentucky costs are for the East Bend Plant only; no reported April 2016 coal purchases for East Bend Plant.

2.- Kentucky Power's Big Sandy #2 retired in 2015 and Big Sandy #1 converted to natural gas in mid-2016.

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

Case No. 2017-00006 Witness: Mark W. McAdams Attachment for Response to PSC 1-18 Page 1 of 8

## Big Rivers Electric Corporation Case No. 2017-00006

| Cents per MMBTU (Big Rivers without Pet Coke) |                |               |               |        |        |        |  |  |
|-----------------------------------------------|----------------|---------------|---------------|--------|--------|--------|--|--|
| Company                                       | Nov-15         | Dec-15        | Jan-16        | Feb-16 | Mar-16 | Apr-16 |  |  |
| <b>Big Rivers Electric Corporation</b>        | 226.15         | 221.67        | 221.30        | 213.83 | 223.59 | 227.81 |  |  |
| Duke Energy - Kentucky <sup>1</sup>           | 218. <b>99</b> | 210.58        | 208.76        | 202.05 | 196.67 | 0.00   |  |  |
| Louisville Gas and Electric Company           | 224.39         | 224.25        | 214.65        | 212.17 | 211.19 | 213.48 |  |  |
| Kentucky Utilites Company                     | 220.8 <b>9</b> | 220.30        | <b>212.99</b> | 211.49 | 207.41 | 202.16 |  |  |
| East Kentucky Power Cooperative               | 220.50         | 226.90        | 227.80        | 223.20 | 225.00 | 221.40 |  |  |
| Kentucky Power <sup>2</sup>                   | 106.81         | 0.00          | 0.00          | 0.00   | 0.00   | 0.00   |  |  |
| Company                                       | May-16         | Jun-16        | Jul-16        | Aug-16 | Sep-16 | Oct-16 |  |  |
| <b>Big Rivers Electric Corporation</b>        | 231.87         | 227.52        | 229.39        | 224.15 | 231.42 | 226.91 |  |  |
| Duke Energy - Kentucky <sup>1</sup>           | 193.06         | 205.84        | 205.36        | 206.53 | 207.02 | 201.14 |  |  |
| Louisville Gas and Electric Company           | 210.40         | 212.68        | 210.39        | 212.64 | 207.13 | 201.87 |  |  |
| Kentucky Utilites Company                     | 205.40         | <b>203.94</b> | 215.91        | 206.25 | 208.12 | 236.54 |  |  |
| East Kentucky Power Cooperative               | 218.90         | 221.30        | 222.00        | 223.70 | 221.30 | 223.30 |  |  |
| Kentucky Power <sup>2</sup>                   | 0.00           | 0.00          | 0.00          | 0.00   | 0.00   | 0.00   |  |  |

Note(s):

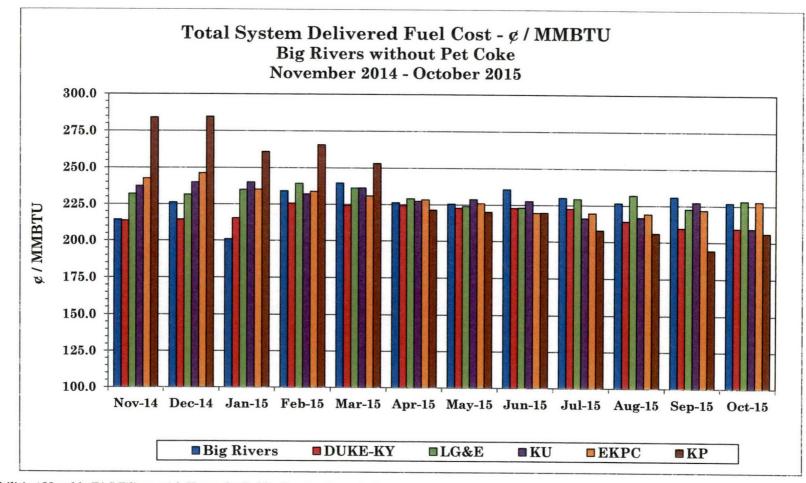
1.- Duke Energy-Kentucky costs are for the East Bend Plant only; no reported April 2016 coal purchases for East Bend Plant.

2.- Kentucky Power's Big Sandy #2 retired in 2015 and Big Sandy #1 converted to natural gas in mid-2016.

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

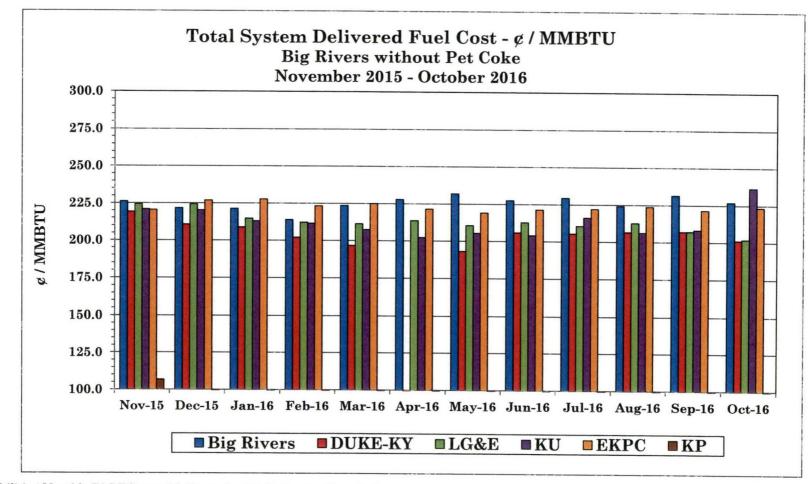
Case No. 2017-00006 Witness: Mark W. McAdams Attachment for Response to PSC 1-18 Page 2 of 8

## Big Rivers Electric Corporation Case No. 2017-00006



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

Case No. 2017-00006 Witness: Mark W. McAdams Attachment for Response to PSC 1-18 Page 3 of 8



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

Case No. 2017-00006 Witness: Mark W. McAdams Attachment for Response to PSC 1-18 Page 4 of 8

| Cents per                              | Cents per MMBTU (Big Rivers with Pet Coke) |        |               |        |                  |                  |  |
|----------------------------------------|--------------------------------------------|--------|---------------|--------|------------------|------------------|--|
| Company                                | Nov-14                                     | Dec-14 | Jan-15        | Feb-15 | Mar-15           | Apr-15           |  |
| <b>Big Rivers Electric Corporation</b> | 209.46                                     | 216.02 | 199.51        | 227.76 | 232.22           | 211.27           |  |
| Duke Energy - Kentucky <sup>1</sup>    | 213.66                                     | 214.39 | 215.27        | 225.74 | 224.40           | 224.40           |  |
| Louisville Gas and Electric Company    | 232.03                                     | 231.47 | 234.83        | 239.23 | 236.16           | 224.40<br>229.07 |  |
| Kentucky Utilites Company              | 237.41                                     | 239.83 | 240.04        | 232.01 | 236.25           | 225.01           |  |
| East Kentucky Power Cooperative        | 242.70                                     | 246.20 | 235.10        | 233.80 | 230.90           | 228.40           |  |
| Kentucky Power <sup>2</sup>            | 284.11                                     | 284.64 | <b>260.94</b> | 265.59 | 252.99           | 221.32           |  |
| Company                                | May-15                                     | Jun-15 | Jul-15        | Aug-15 | Sep-15           | Oct-15           |  |
| <b>Big Rivers Electric Corporation</b> | 208.53                                     | 225.41 | 227.63        | 220.13 | 218.79           | 214.77           |  |
| Duke Energy - Kentucky <sup>1</sup>    | 222.86                                     | 222.95 | 222.53        | 214.04 | 209.50           |                  |  |
| Louisville Gas and Electric Company    | 223.92                                     | 223.11 | 229.30        | 231.93 | 209.50<br>222.57 | 209.33<br>228.39 |  |
| Kentucky Utilites Company              | 228.74                                     | 227.63 | 216.00        | 216.61 | 222.07<br>227.26 | 228.39           |  |
| East Kentucky Power Cooperative        | 226.00                                     | 219.50 | 219.50        | 219.20 | 221.20<br>221.90 | 209.25<br>227.90 |  |
| Kentucky Power <sup>2</sup>            | 220.04                                     | 219.59 | 207.77        | 206.03 | 194.38           | 206.13           |  |

Note(s):

1.- Duke Energy-Kentucky costs are for the East Bend Plant only; no reported April 2016 coal purchases for East Bend Plant.

2.- Kentucky Power's Big Sandy #2 retired in 2015 and Big Sandy #1 converted to natural gas in mid-2016.

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

Case No. 2017-00006 Witness: Mark W. McAdams Attachment for Response to PSC 1-18 Page 5 of 8

| Cents per                              | MMBTU (Bi     | g Rivers w     | ith Pet Co | ke)             |        | Cents per MMBTU (Big Rivers with Pet Coke) |  |  |  |  |  |  |
|----------------------------------------|---------------|----------------|------------|-----------------|--------|--------------------------------------------|--|--|--|--|--|--|
| Company                                | Nov-15        | Dec-15         | Jan-16     | Feb-16          | Mar-16 | Apr-16                                     |  |  |  |  |  |  |
| <b>Big Rivers Electric Corporation</b> | 212.72        | 205.75         | 210.40     | 210. <b>9</b> 2 | 223.59 | 227.81                                     |  |  |  |  |  |  |
| Duke Energy - Kentucky <sup>1</sup>    | <b>218.99</b> | 210.58         | 208.76     | 202.05          | 196.67 | 0.00                                       |  |  |  |  |  |  |
| Louisville Gas and Electric Company    | 224.39        | 224.25         | 214.65     | 212.17          | 211.19 | 213.48                                     |  |  |  |  |  |  |
| Kentucky Utilites Company              | 220.89        | 220.30         | 212.99     | 211.49          | 207.41 | 202.16                                     |  |  |  |  |  |  |
| East Kentucky Power Cooperative        | 220.50        | <b>226.9</b> 0 | 227.80     | 223.20          | 225.00 | 221.40                                     |  |  |  |  |  |  |
| Kentucky Power <sup>2</sup>            | 106.81        | 0.00           | 0.00       | 0.00            | 0.00   | 0.00                                       |  |  |  |  |  |  |
| Company                                | May-16        | Jun-16         | Jul-16     | Aug-16          | Sep-16 | Oct-16                                     |  |  |  |  |  |  |
| <b>Big Rivers Electric Corporation</b> | 231.87        | 227.52         | 229.39     | 224.15          | 231.42 | 221.73                                     |  |  |  |  |  |  |
| Duke Energy - Kentucky <sup>1</sup>    | 193.06        | 205.84         | 205.36     | 206.53          | 207.02 | 201.14                                     |  |  |  |  |  |  |
| Louisville Gas and Electric Company    | 210.40        | 212.68         | 210.39     | 212.64          | 207.13 | 201.14                                     |  |  |  |  |  |  |
| Kentucky Utilites Company              | 205.40        | 203.94         | 215.91     | 206.25          | 208.12 | 236.54                                     |  |  |  |  |  |  |
| East Kentucky Power Cooperative        | 218.90        | 221.30         | 222.00     | 223.70          | 200.12 | 200.04                                     |  |  |  |  |  |  |
| Kentucky Power <sup>2</sup>            | 0.00          | 0.00           | 0.00       | 0.00            | 0.00   | 0.00                                       |  |  |  |  |  |  |

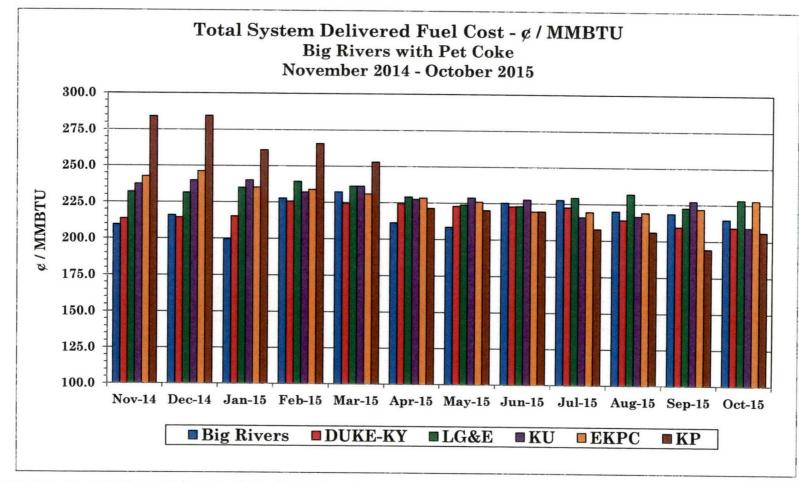
Note(s):

1.- Duke Energy-Kentucky costs are for the East Bend Plant only; no reported April 2016 coal purchases for East Bend Plant.

2.- Kentucky Power's Big Sandy #2 retired in 2015 and Big Sandy #1 converted to natural gas in mid-2016.

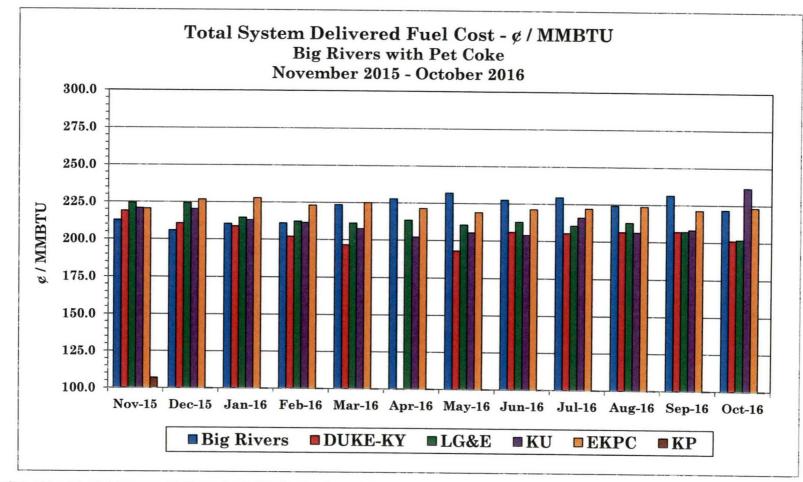
Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

Case No. 2017-00006 Witness: Mark W. McAdams Attachment for Response to PSC 1-18 Page 6 of 8



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

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

Case No. 2017-00006 Witness: Mark W. McAdams Attachment for Response to PSC 1-18 Page 8 of 8

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

| 1       Item 19)       For the period under review by generating station, list the         2       percentages of Big Rivers' coal delivered by:         3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1  | Item 19)     | For the new          | ad undan      | maniar h.     | an matin a   | station list   | 41   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|--------------|----------------------|---------------|---------------|--------------|----------------|------|
| 3       a. Rail;         5       b. Truck;         6       c. Barge; and         7       d. Other (specify)         8         9       Response) Big Rivers' solid fuels deliveries by generating station for November         10       1, 2014, through October 31, 2016, are as follows:         11       a. Rail       b. Truck       c. Barge       d. Other         Coleman 7       0%       0%       0%       0%         Green       0%       9.03%       90.97%       0%         Reid 8       0%       100%       0%       0%         Wilson       0%       70.30%       29.70%       0%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | T  | ,            |                      |               |               | generating   | station, list  | tne  |
| 4       a. Rail;         5       b. Truck;         6       c. Barge; and         7       d. Other (specify)         8         9       Response) Big Rivers' solid fuels deliveries by generating station for November         10       1, 2014, through October 31, 2016, are as follows:         11         a. Rail         Truck c. Barge d. Other         Coleman 7       0%       0%       0%         Green       0%       90.97%       0%         Reid <sup>8</sup> 0%       100%       0%       0%         Wilson       0%       70.30%       29.70%       0%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2  | percentage   | es of Big River      | s' coal deli  | vered by:     |              |                |      |
| 5       b. Truck;         6       c. Barge; and         7       d. Other (specify)         8         9       Response) Big Rivers' solid fuels deliveries by generating station for November         10       1, 2014, through October 31, 2016, are as follows:         11         a. Rail         D. Truck         Coleman 7         0%       0%         0%       90.97%         0%       0%         11       0%         A. Rail         b. Truck         Coleman 7         0%       90.97%         0%       90.97%         0%       90.97%         0%       100%         0%       91.00%         0%       92.70%         12       13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3  |              |                      |               |               |              |                |      |
| $ \begin{array}{cccccccccccccccccccccccccccccccccccc$                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 4  |              | a. Rail;             |               |               |              |                |      |
| 7       d. Other (specify)         8       9         9       Response) Big Rivers' solid fuels deliveries by generating station for November         10       1, 2014, through October 31, 2016, are as follows:         11       a. Rail       b. Truck       c. Barge       d. Other         10       6. Other       0%       0%       0%       0%         11       0%       9.03%       90.97%       0%       0%         11       0%       9.03%       90.97%       0%       0%         12       13       0%       100%       0%       0%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 5  |              | b. Truck;            |               |               |              |                |      |
| 8       9       Response) Big Rivers' solid fuels deliveries by generating station for November         10       1, 2014, through October 31, 2016, are as follows:         11       a. Rail       b. Truck       c. Barge       d. Other         11       coleman 7       0%       0%       0%         11       Green       0%       9.03%       90.97%       0%         11       Reid *       0%       100%       0%       0%         11       0%       99.40%       0.60%       0%         12       13       14       14       14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 6  |              | c. Barge; an         | d             |               |              |                |      |
| 9       Response) Big Rivers' solid fuels deliveries by generating station for November         10       1, 2014, through October 31, 2016, are as follows:         11       a. Rail       b. Truck       c. Barge       d. Other         11       Coleman 7       0%       0%       0%         11       Green       0%       9.03%       90.97%       0%         11       Reid <sup>8</sup> 0%       100%       0%       0%         12       13       0%       99.40%       0.60%       0%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 7  |              | d. Other (spe        | ecify)        |               |              |                |      |
| 10       1, 2014, through October 31, 2016, are as follows:         11         a. Rail       b. Truck       c. Barge       d. Other         Coleman 7       0%       0%       0%         Green       0%       9.03%       90.97%       0%         Reid <sup>8</sup> 0%       100%       0%       0%         Station II       0%       99.40%       0.60%       0%         Wilson       0%       70.30%       29.70%       0%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 8  |              |                      |               |               |              |                |      |
| a. Rail       b. Truck       c. Barge       d. Other         Coleman 7       0%       0%       0%         Green       0%       9.03%       90.97%       0%         Reid 8       0%       100%       0%       0%         Station II       0%       99.40%       0.60%       0%         Wilson       0%       70.30%       29.70%       0%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 9  | Response)    | Big Rivers' sol      | lid fuels del | iveries by ge | nerating sta | tion for Noven | ıber |
| a. Rail       b. Truck       c. Barge       d. Other         Coleman 7       0%       0%       0%       0%         Green       0%       9.03%       90.97%       0%         Reid 8       0%       100%       0%       0%         Station II       0%       99.40%       0.60%       0%         Wilson       0%       70.30%       29.70%       0%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 10 | 1, 2014, thr | ough October 31      | l, 2016, are  | as follows:   |              |                |      |
| Coleman 7         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0%         0% | 11 |              |                      |               |               |              |                |      |
| Green         0%         9.03%         90.97%         0%           Reid <sup>8</sup> 0%         100%         0%         0%           Station II         0%         99.40%         0.60%         0%           Wilson         0%         70.30%         29.70%         0%           12         13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |    |              |                      | a. Rail       | b. Truck      | c. Barge     | d. Other       |      |
| Reid 8         0%         100%         0%         0%           Station II         0%         99.40%         0.60%         0%           Wilson         0%         70.30%         29.70%         0%           12         13         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         .         <                                           |    |              | Coleman <sup>7</sup> | 0%            | 0%            | 0%           | 0%             |      |
| Station II         0%         99.40%         0.60%         0%           Wilson         0%         70.30%         29.70%         0%           12         13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |    |              | Green                | 0%            | 9.03%         | 90.97%       | 0%             |      |
| Wilson         0%         70.30%         29.70%         0%           12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |    |              | Reid <sup>8</sup>    | 0%            | 100%          | 0%           | 0%             |      |
| 12<br>13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |    |              | Station II           | 0%            | <b>99.40%</b> | 0.60%        | 0%             |      |
| 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |    |              | Wilson               | 0%            | 70.30%        | 29.70%       | 0%             |      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 12 |              |                      |               |               |              |                |      |
| 14 Witness) Mark W. McAdams                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 13 |              |                      |               |               |              |                |      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 14 | Witness)     | Mark W. McAe         | dams          |               |              |                |      |

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<sup>&</sup>lt;sup>7</sup> Coleman Station was idled in May 2014.

<sup>&</sup>lt;sup>8</sup> Reid Station was idled in April 2016.

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

# 1Item 20)For each generating station, state the methods of coal delivery2currently available.

3

**Response)** The currently available methods for coal deliveries to Big Rivers'
generating stations is shown below.

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|            | Rail          | Truck     | Barge     |
|------------|---------------|-----------|-----------|
| Coleman    | Not Available | Available | Available |
| Green      | Not Available | Available | Available |
| Reid       | Not Available | Available | Available |
| Station II | Not Available | Available | Available |
| Wilson     | Not Available | Available | Available |
|            |               |           |           |

7 8 9 **Witness)** Mark W. McAdams

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Case No. 2017-00006 Response to PSC 1-20 Witness: Mark W. McAdams Page 1 of 1

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

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## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 21)  |                                                                 |
|----|-----------|-----------------------------------------------------------------|
| 2  |           | a. State Big Rivers' coal inventory level in tons and in number |
| 3  |           | of days' supply as of October 31, 2016. Provide this            |
| 4  |           | information by generating station and in the aggregate.         |
| 5  |           | b. Describe the criteria used to determine the number of days'  |
| 6  |           | supply.                                                         |
| 7  |           | c. Compare Big Rivers' coal inventory as of October 31, 2016 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 the excessive inventory.    |
| 12 |           | е.                                                              |
| 13 |           | (1) State whether Big Rivers expects any significant            |
| 14 |           | changes in its current coal inventory target within the         |
| 15 |           | next 12 months.                                                 |
| 16 |           | (2) If the response is yes, state the expected change and the   |
| 17 |           | reasons for this change.                                        |
| 18 |           |                                                                 |
| 19 | Response) |                                                                 |
| 20 |           | a. As of October 31, 2016, Big Rivers' generating stations      |
| 21 |           | individually and in the aggregate had the following inventory   |
| 22 |           | levels and days' supply.                                        |
| 23 |           |                                                                 |
| 24 |           |                                                                 |
| 25 |           |                                                                 |
|    |           | Case No. 2017 000                                               |

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## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

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| Total<br>System/Station       | Inventory Level<br>(In Tons) <sup>1</sup> | Number of Days'<br>Supply <sup>2</sup> | Duration<br>(In Days) | Preceding 6<br>Months<br>Burn (In Tons) |
|-------------------------------|-------------------------------------------|----------------------------------------|-----------------------|-----------------------------------------|
| Big Rivers<br>Electric System | 1,152,328.93                              | 65                                     | 86                    | 1,520,543.69                            |
| Reid Station <sup>3</sup>     | 0.00                                      | 0                                      | 0                     | 0.00                                    |
| Station II <sup>4</sup>       | 361,506.83                                | 292                                    | 134                   | 165,969,76                              |
| Green Station <sup>5</sup>    | 207,288.60                                | 53                                     | 165                   | 640,214.40                              |
| Coleman Station <sup>6</sup>  | 0.00                                      | 0                                      | 0                     | 0.00                                    |
| Wilson Station <sup>7</sup>   | 583,533.51                                | 141                                    | 173                   | 714,359.53                              |

- 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.

|              | Electric Corporation<br>tory Target Ranges | _ |
|--------------|--------------------------------------------|---|
| Total System | 30 – 60 Days                               |   |
| Reid Station | 0 Days                                     |   |
| Station II   | 30-60Days                                  |   |
| Green        | 30-60 Days                                 |   |
| Coleman      | 0 Days                                     |   |
| Wilson       | 30-60 Days                                 |   |

d. The actual inventory for Henderson Station Two ("Station II") exceeds the target range by 232 days. Reduced demand for electricity and the planned outage on Station II Unit 1 in 2016, plus unscheduled outages and other scheduled maintenance outages caused Station II to exceed its target range. Station II Unit 1 had a Basic Planned Outage of 1,194 hours from May 1,

Case No. 2017-00006 Response to PSC 1-21 Witness: Mark W. McAdams Page 2 of 4

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

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2016, through June 19, 2016. There were unscheduled outages on Station II Unit 1 and Unit 2, during the period under review, totaling 808 hours, other planned maintenance outages totaling 339 hours, and reserve outages (economic) totaling 55 hours. Wilson Station exceeded its target range by 81 days due to the impact of electricity market conditions and demand. Wilson had un-scheduled outages during the period under review of 235 hours and reserve outages of 29 hours. Big Rivers' Total System exceeded its target range by five days.

(1) Yes.

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(2) Big Rivers, as part of its sold fuel procurement plans, has intentionally reduced its sold fuel procurement in order to reclaim coal and pet coke that was and is currently held in inventory during the course 2016 and forward into 2017. During 2016, Big Rivers reduced inventory by 366,000 tons as compared to end-of-year 2015. By intentionally reducing its market purchases, Big Rivers is focused on inventory reductions at the Station II and Wilson generating stations. Focused inventory reduction is occurring at Station II during 2017, which includes reclaiming nearly 50% of the stations' fuel requirements to ensure inventory reduction. Projections indicate that Big Rivers will have inventory within targets by late third to early fourth quarter of 2017 (barring any further reduced generation as a result of unplanned outages or market

> Case No. 2017-00006 Response to PSC 1-21 Witness: Mark W. McAdams Page 3 of 4

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

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#### February 20, 2017

| 1 | conditions).   | Market    | conditions  | will   | continue    | to    | play  | a  |
|---|----------------|-----------|-------------|--------|-------------|-------|-------|----|
| 2 | significant ro | le in the | pace and ov | verall | quantity of | of ir | vento | ry |
| 3 | reduction.     |           |             |        |             |       |       |    |
| 4 |                |           |             |        |             |       |       |    |

Footnotes -

<sup>1</sup> Green Station had a petcoke inventory level of 2,439.55 tons as of October 31, 2016 and had a target blend of 18% with Green coal. Wilson Station had a petcoke inventory level of 121,033.32 tons as of October 31, 2016 and has a target blend of 15% with Wilson coal.

<sup>2</sup> Number of days' supply is rounded to reflect whole days.

<sup>3</sup> Reid Station Unit 1 was in Idled Reserve Status for 184 days. Reid 1 was put in Idled Status effective April 1, 2016. It is not known at this time if this will be a permanent status. The duration of generation was reduce to 0 days.

<sup>4</sup>Station II Units 1 and 2 had unscheduled and scheduled maintenance hours of 2,341.2 hours and Unit 1 had a Basic Planned outage of 1,194 hours from April 29 through June 19, 2016. These hours were equivalent to 25 days. The duration of generation was reduced to 134 days. There were unscheduled hours of 808 and other minor scheduled outage hours of 39 at Station II Units 1 and 2 during the period under review. These hours were equivalent to 24 days for Station II. There were reserve hours of 55 hours for Station II and this was equivalent to 1 day. Inventory is being reduced to meet the new target; however, due to existing inventory and contract coal, the reduction will still occur over the remainder of 2017.

<sup>5</sup>Green Units 1 and 2 had unscheduled and scheduled maintenance hours of 107.7 hours. Green Units 1 and 2 also had reserve hours of 516.8 hours during the period under review. These hours were equivalent to 19 days. The duration of generation was reduced to 165 days.

<sup>6</sup> Coleman Station Units 1, 2 and 3 were placed on Inactive Reserve Status on May 8, 2014, and this totaled 13,248.0 hours which was equivalent to 184 days. The duration of generation was reduced to 0 days. Coleman Station will have no inventory going forward because it has been idled.

<sup>7</sup> Wilson had 234.7 unscheduled maintenance hours. Wilson had reserve outage hours of 29.1. These hours were equivalent to 11 days. The duration of generation was reduced to 173 days.

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- 7 Witness) Mark W. McAdams
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## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 22)  |                                                                    |
|----|-----------|--------------------------------------------------------------------|
| 2  |           | a. State whether Big Rivers has audited any of its coal            |
| 3  |           | contracts during the period from May 1, 2016, to October 31,       |
| 4  |           | 2016.                                                              |
| 5  |           | b. If the response is 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 of       |
| 10 |           | the audit.                                                         |
| 11 |           |                                                                    |
| 12 | Response) |                                                                    |
| 13 |           | a. Big Rivers has not audited any of its coal contracts during the |
| 14 |           | period from May 1, 2016, to October 31, 2016.                      |
| 15 |           | b. Not Applicable.                                                 |
| 16 |           |                                                                    |
| 17 |           |                                                                    |
| 18 | Witness)  | Mark W. McAdams                                                    |
| 19 |           |                                                                    |

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## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 23)  |                                                                 |
|----|-----------|-----------------------------------------------------------------|
| 2  |           | a. State whether Big Rivers has received any customer           |
| 3  |           | complaints regarding its FAC during the period from May         |
| 4  |           | 1, 2016 to October 31, 2016.                                    |
| 5  |           | b. If the response is 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 its |
| 11 |           | FAC during the period from May 1, 2016 to October 31, 2016.     |
| 12 |           | b. Not Applicable.                                              |
| 13 |           |                                                                 |
| 14 |           |                                                                 |
| 15 | Witness)  | Nicholas R. Castlen                                             |
| 16 |           |                                                                 |

Case No. 2017-00006 Response to PSC 1-23 Witness: Nicholas R. Castlen Page 1 of 1

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 24)  |                                                                       |
|----|-----------|-----------------------------------------------------------------------|
| 2  |           | a. State whether Big Rivers is currently involved in any              |
| 3  |           | litigation with its current or former coal suppliers.                 |
| 4  |           | b. If the response is 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 Rivers;          |
| 8  |           | (4) List the issues presented; and                                    |
| 9  |           | (5) Provide a copy of the complaint or other legal pleading           |
| 10 |           | that initiated the litigation and any answers or                      |
| 11 |           | counterclaims. If a copy has previously been filed with               |
| 12 |           | the Commission, provide the date on which it was filed                |
| 13 |           | and the case in which it was filed.                                   |
| 14 |           | c. State the current status of all litigation with coal suppliers.    |
| 15 |           |                                                                       |
| 16 | Response) |                                                                       |
| 17 |           | a. Big Rivers is not currently involved in any litigation with any of |
| 18 |           | its current or former coal suppliers.                                 |
| 19 |           | b.(1) – b.(5) Not Applicable.                                         |
| 20 |           | c. Not Applicable.                                                    |
| 21 |           |                                                                       |
| 22 |           |                                                                       |
| 23 | Witness)  | Mark W. McAdams                                                       |
| 24 |           |                                                                       |

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## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

#### Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

Item 25) List each written coal supply solicitation issued during the
 2 period May 1, 2016, to October 31, 2016.

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

b. For each solicitation, state the number of vendors to whom 9 10 the solicitation was sent, the number of vendors who 11 responded, and the selected vendor(s). Provide the bid 12 tabulation sheet or corresponding document that ranks the 13 proposals. (This document shall identify all vendors who 14 made offers.) State the reasons for each selection. For ach lowest-cost bid not selected, explain why the bid was not 15 16 selected.

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18 Response) Big Rivers did not issue any written coal supply solicitations during
19 the period May 1, 2016, to October 31, 2016.

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22 Witness) Mark W. McAdams

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Case No. 2017-00006 Response to PSC 1-25 Witness: Mark W. McAdams Page 1 of 1

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1Item 26)List each oral solicitation for coal supplies issued during the2period from May 1, 2016 to October 31, 2016.

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

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

17 **Response**)

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a. On August 26, 2016, Big Rivers orally (via telephone and e-mail) solicited two petroleum coke resellers, TCP PetCoke Corporation and Oxbow Energy Solutions, in regard to potential availability of a small spot order of 30,000 to 60,000 tons of petroleum coke for delivery during the fourth quarter of 2016. Big Rivers' Green Station was utilizing petroleum coke per generating plan and, if the current generation continued at plan, could potentially run

Case No. 2017-00006 Response to PSC 1-26 Witness: Mark W. McAdams Page 1 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

1 out of petroleum coke for blending sometime in October or 2 November of 2016. The quality of the petroleum coke ranged from 3 13,500 to 14,200 BTU/lb., 6 to 8% moisture, 0.25 to 1% ash, 10-12% volatile matter, sulfur 5.0 to 7.0%, and HGI 38 to 55. 4 5 b. TCP PetCoke provided a bid of \$23.35/ton F.O.B. barge, while 6 Oxbow Energy Solutions provided a bid 7 Big Rivers had recently completed a 8 solicitation for barging services and had offers in hand from Canal 9 Barge Line "(Canal") and Ingram Barge Lines ("Ingram") for 10 delivery of pet coke. Those offers were refreshed in regard to 11 transportation, with Canal providing a firm Q4 2016 offer of 12 \$17.65/ton for transport, and Ingram Canal's offer 13 was combined with TCP PetCoke's \$23.35/ton F.O.B. barge 14 pricing for a total delivered pricing of \$41/ton or \$1.4643/MMBTU. 15 Oxbow's offer was **TCP** PetCoke's 16 offer, along with Canal Barge Line transportation, was accepted 17 for the small spot purchase of petroleum coke (BRE-16-004) and 18 transportation (BRE-16-005) and was delivered to Big Rivers' 19 Green generating station. 20 21 22 Witness) Mark W. McAdams

23

Case No. 2017-00006 Response to PSC 1-26 Witness: Mark W. McAdams Page 2 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 Item 27) For the period from May 1, 2016, to October 31, 2016, list each 2 vendor from whom coal was purchased and the quantity and nature of 3 each purchase (e.g., spot or contract). For the period under review in 4 total, provide the percentage of purchases that were spot versus contract. 5

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

7

For the Period from May 1, 2016, through October 31, 2016

| Purchase Vendor                   | Fuel Type         | Purchase<br>Tonnage  | Contract<br>Type |
|-----------------------------------|-------------------|----------------------|------------------|
| Sebree Mining                     | Coal              | 587,620.30           | Contract         |
| Foresight Coal                    | Coal              | 132,150.09           | Contract         |
| KenAmerican Resources             | Coal              | 247,292.69           | Contract         |
| Rhino Energy                      | Coal              | 182,497.20           | Contract         |
| Peabody COALSALES                 | Coal              | 190,362.00           | Contract         |
| Alliance Coal                     | Coal              | 108,123.77           | Contract         |
| TCP PetCoke Corporation           | Pet Coke          | 17,318.55            | Spot             |
| Total Tonnage                     | =                 | 1,465,364.60         | -                |
| For the Period from Nov           | ember 1, 2014, th | rough October 31, 20 | 16               |
| Percentage Spot Purchase Tons     |                   | 17.58 %              |                  |
| Percentage Contract Purchase Tons | _                 | 82.42 %              |                  |
| Percentage Total Purchase Tons    | -                 | 100.00 %             |                  |

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10 Witness) Mark W. McAdams

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Case No. 2017-00006 Response to PSC 1-27 Witness: Mark W. McAdams Page 1 of 1

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## **Response to Commission Staff's Request for Information** dated February 6, 2017

#### February 20, 2017

1 **Item 28)** For the period from May 1, 2016 to October 31, 2016, list each vendor from whom natural gas was purchased for generation and the 2 3 quantity and nature of each purchase (e.g., spot or contract). For the 4 period under review in total, provide the percentage of purchases that 5 were spot versus contract.

6

7 **Response**) Please see the listing on the following page for vendors from whom natural gas was purchased for generation and the quantity and nature of each 8 9 purchase from May 1, 2016, through October 31, 2016. Also on the following page please see the percentage of purchases that were either spot versus contract for 10 the period under review in total. 11

12

Starting in July 2010, Big Rivers began purchasing natural gas 13 under a North American Energy Standard Board ("NAESB") base contract for sale 14 and purchase of natural gas. Actual purchases of natural gas are made using 15 transaction confirmations that are governed by the NAESB contract. Big Rivers also entered into a contract with Texas Gas Transmission, LLC for the 16 17 transportation, storage, and borrowing of natural gas to Big Rivers' delivery point, 18 the Reid Combustion Turbine. All of these contracts are on file with the Kentucky Public Service Commission. 19

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Case No. 2017-00006 **Response to PSC 1-28** Witness: Wayne O'Bryan Page 1 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

|  | 2 | ł |  |
|--|---|---|--|
|  |   |   |  |
|  |   |   |  |
|  |   |   |  |

| Purchase Vendor              | Fuel Type            | MCF           | Contract Type |
|------------------------------|----------------------|---------------|---------------|
| CIMA Energy, LTD             | Natural Gas          | 58,850        | Spot          |
| Tenaska Marketing Ventures   | Natural Gas          | 2,067         | Spot          |
| For the Period from N        | lovember 1, 2014, tl | hrough Octobe | er 31, 2016   |
| Percentage Contract          | 0.00 %               |               |               |
| Percentage Spot              | 100.00 %             |               |               |
| Percentage Total             | 100.00 %             |               |               |
|                              |                      |               |               |
| z <b>ness)</b> Wayne O'Bryan |                      |               |               |

Case No. 2017-00006 Response to PSC 1-28 Witness: Wayne O'Bryan Page 2 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 Item 29) State whether Big Rivers engages in hedging activities for its

2 coal or natural gas purchases used for generation. If the response is yes,

3 describe the 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. Big Rivers does, however,
7 stagger its purchases of coal to create a natural hedge on price volatility pursuant
8 to Policy No. 111 - Hedge Policy.

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11 Witnesses) Mark W. McAdams (Coal) and

12 Wayne O'Bryan (Natural Gas)

13

Case No. 2017-00006 Response to PSC 1-29 Witnesses: Mark W. McAdams (*Coal*) and Wayne O'Bryan (*Natural Gas*) Page 1 of 1

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 Item 30) For each generating station or unit for which a separate coal 2 pile is maintained, state for the period from May 1, 2016, to October 31, 3 2016 the actual amount of coal burned in tons, actual amount of coal 4 deliveries in tons, total kWh generated, and actual capacity factor at 5 which the plant operated.

6

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

12

| Plant                        | Coal &<br>Pet Coke<br>Burn<br>(Tons) | Coal &<br>Pet Coke<br>Receipts<br>(Tons) | Net kWh       | Capacity<br>Factor<br>(Net MWh) /<br>(Period Hrs x<br>MW rating) |
|------------------------------|--------------------------------------|------------------------------------------|---------------|------------------------------------------------------------------|
| Reid Station (Coal)          | 0.00                                 | 0.00                                     | (8,541,000)   | -2.98%                                                           |
| Station Two (Coal) *         | 165,969.76                           | 240,204.70                               | 372,315,470   | 57.98%                                                           |
| Green Station (Coal)         | 496,978.40                           | 500,333.92                               | 1,353,072,908 | 67.49%                                                           |
| Green Station (Pet Coke) **  | 143,236.00                           | 17,318.55                                |               |                                                                  |
| Coleman Station (Coal)       | 0.00                                 | 0.00                                     | (4,314,000)   | -0.22%                                                           |
| Wilson Station (Coal)        | 613,826.23                           | 707,507.43                               | 1,611,469,940 | 87.51%                                                           |
| Wilson Station (Pet Coke) ** | 100,533.30                           | 0.00                                     |               |                                                                  |

\* Net of City of Henderson. City of Henderson generation take was 426,476,000 kWhs. Part of the City of Henderson generation take was 118,786,000 kWhs for excess energy not taken by Big Rivers effective June 1, 2016.

\*\* Net kWh and Capacity Factor includes energy from burning Coal and Pet Coke.

13

14

Case No. 2017-00006 Response to PSC 1-30 Witness: Mark W. McAdams Page 1 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

- 2 Witness) Mark W. McAdams
- 3

1

Case No. 2017-00006 Response to PSC 1-30 Witness: Mark W. McAdams Page 2 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

#### Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 Item 31) For each natural gas generating unit, state for the period from

2 May 1, 2016 to October 31, 2016, the actual amount of natural gas burned,

3 total kWh generated and actual capacity factor at which the plant
4 operated.

5

6 Response) Big Rivers Electric Corporation has only one natural gas generating
7 unit and this is the Reid Combustion Turbine ("CT"). Please see the table below
8 for the actual amount of natural gas ("NG") burned, total kWh generated, and net
9 kWh generated.

10

| Big Rivers Electric Corporation<br>For the Period from May 1, 2016, through October 31, 2016 |        |           |           |  |  |
|----------------------------------------------------------------------------------------------|--------|-----------|-----------|--|--|
| Generating NG Burned Total kWh Net kWh                                                       |        |           |           |  |  |
| Unit                                                                                         | (Mcf)  | Generated | Generated |  |  |
| Reid CT                                                                                      | 60,317 | 3,678,000 | 3,316,000 |  |  |

11

12 Big Rivers calculates capacity factors per the IEEE<sup>9</sup> Std. 762–2006 as 13 approved by the American National Standards Institute. Gross Capacity Factor 14 ("GCF") is the gross energy that was produced by a generating unit in a given period as a fraction of the gross maximum generation ("GMG"). GMG is the 15 16 period hours (PH) times the gross maximum capacity (GMC). Net Capacity Factor ("NCF") is the net energy that was produced by a generating unit in a given period 17 as a fraction of the net maximum generation ("NMG"). NMG is the period hours 18 19 (PH) times the net maximum capacity (NMC). The GCF and NCF for Big Rivers' 20 Reid CT Turbine are shown in the table below.

<sup>9</sup> IEEE = Institute of Electrical and Electronics Engineers.

Case No. 2017-00006 Response to PSC 1-31 Witnesses: Wayne O'Bryan (*NG Generating Units*) and Jason C. Burden (*Capacity Factor*) Page 1 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| Big Rivers Electric Corporation<br>Gross Capacity Factor and Net Capacity Factor<br>Reid Station CT |              |              |              |              |              |              |        |
|-----------------------------------------------------------------------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------|
|                                                                                                     | May-<br>2016 | Jun-<br>2016 | Jul-<br>2016 | Aug-<br>2016 | Sep-<br>2016 | Oct-<br>2016 | Period |
| GCF                                                                                                 | 0            | 0.48         | 2.40         | 2.46         | 0.89         | 1.31         | 1.26   |
| NCF                                                                                                 | 0            | 0.34         | 2.23         | 2.34         | 0.81         | 1.20         | 1.16   |

2

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3 4

Witnesses: Wayne O'Bryan (NG Generating Units) and

Jason C. Burden (Capacity Factor)

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Case No. 2017-00006 Response to PSC 1-31 Witnesses: Wayne O'Bryan (*NG Generating Units*) and Jason C. Burden (*Capacity Factor*) Page 2 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 32)                                                           |
|----|--------------------------------------------------------------------|
| 2  | a. During the period from May 1, 2016 to October 31, 2016,         |
| 3  | have there been any changes to Big Rivers' written policies        |
| 4  | and procedures regarding its fuel procurement?                     |
| 5  | b. If yes,                                                         |
| 6  | (1)Describe the changes;                                           |
| 7  | (2) State the date(s) the changes were made;                       |
| 8  | (3) Explain why the changes were made; and                         |
| 9  | (4) Provide the written policies and procedures as changed.        |
| 10 | c. If no, provide the date when Big Rivers' current fuel           |
| 11 | procurement policies and procedures were last changed,             |
| 12 | when they were last provided to the Commission, and                |
| 13 | identify the proceeding in which they were provided.               |
| 14 |                                                                    |
| 15 | Response)                                                          |
| 16 | a. Yes. During the period May 1, 2016, through October 31, 2016,   |
| 17 | Big Rivers made changes to the following fuel-related policies and |
| 18 | procedures:                                                        |
| 19 | i. Policy No. 111 – Hedge Policy;                                  |
| 20 | ii. Policy No. 120 – Fuel Procurement Policy and Procedure.        |
| 21 | b. (1) through (4)                                                 |
| 22 |                                                                    |
| 23 |                                                                    |

Case No. 2017-00006 Response to PSC 1-32 Witnesses: Mark W. McAdams (*Coal*) and Wayne O'Bryan (*Natural Gas*) Page 1 of 3

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

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## Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | <u>Policy No. 111 – Hedge Policy</u>                               |  |  |  |  |  |  |  |
|----|--------------------------------------------------------------------|--|--|--|--|--|--|--|
| 2  | On September 16, 2016, Big Rivers clarified references             |  |  |  |  |  |  |  |
| 3  | to Big Rivers' Energy-Related Transaction Authority Policy         |  |  |  |  |  |  |  |
| 4  | (Board Policy 105).                                                |  |  |  |  |  |  |  |
| 5  |                                                                    |  |  |  |  |  |  |  |
| 6  | Policy No. 120 – Fuel Procurement Policy and Procedure             |  |  |  |  |  |  |  |
| 7  | On September 16, 2016, Big Rivers made the following               |  |  |  |  |  |  |  |
| 8  | changes –                                                          |  |  |  |  |  |  |  |
| 9  | i. Unified all references to Big Rivers Electric Corporation as    |  |  |  |  |  |  |  |
| 10 | 'Big Rivers' versus prior use of 'Company';                        |  |  |  |  |  |  |  |
| 11 | ii. Clarified references to other Big Rivers' policies including – |  |  |  |  |  |  |  |
| 12 | (1) Energy-Related Transaction Authority Policy (Board             |  |  |  |  |  |  |  |
| 13 | Policy 105),                                                       |  |  |  |  |  |  |  |
| 14 | (2) Solid Fuel Inventory Policy (Board Policy 121),                |  |  |  |  |  |  |  |
| 15 | (3) Board of Directors Ethics Policy (Board Policy 102),           |  |  |  |  |  |  |  |
| 16 | and                                                                |  |  |  |  |  |  |  |
| 17 | (4) Conflicts of Interest Policy (Board Policy 108) for Big        |  |  |  |  |  |  |  |
| 18 | Rivers' employees;                                                 |  |  |  |  |  |  |  |
| 19 | iii. Clarified references to Big Rivers' Fuel Procurement          |  |  |  |  |  |  |  |
| 20 | organization;                                                      |  |  |  |  |  |  |  |
| 21 | iv. Minor wording and formatting changes.                          |  |  |  |  |  |  |  |
| 22 |                                                                    |  |  |  |  |  |  |  |
| 23 | c. Big Rivers' other fuel procurement policies and procedures were |  |  |  |  |  |  |  |
| 24 | not changed during the period of May 1, 2016, through October      |  |  |  |  |  |  |  |
|    |                                                                    |  |  |  |  |  |  |  |

Case No. 2017-00006 Response to PSC 1-32 Witnesses: Mark W. McAdams (*Coal*) and Wayne O'Bryan (*Natural Gas*) Page 2 of 3

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

### Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

31, 2016. In the table below, Big Rivers lists those unchanged policies and procedures, the dates of their last changes, and the proceedings in which Big Rivers provided them to the Commission.

| Big Rivers Electric Corporation<br>Policies and Procedures for Fuel Procurement |                                                            |                          |                        |                  |  |  |  |
|---------------------------------------------------------------------------------|------------------------------------------------------------|--------------------------|------------------------|------------------|--|--|--|
| Number                                                                          | Name                                                       | Date<br>Last<br>Change   | Provided<br>In         | Date<br>Provided |  |  |  |
| 105                                                                             | Energy-Related Transaction<br>Authority                    | 2016-02-23               | Case No.<br>2016-00235 | 2016-08-26       |  |  |  |
| 105                                                                             | Appendix A: Energy-Related<br>Transaction Authority Policy | 2016-04-05<br>2016-04-15 | Case No.<br>2016-00235 | 2016-08-26       |  |  |  |
| 121                                                                             | Solid Fuel Inventory Policy                                | 2015-08-21               | Case No.<br>2016-00006 | 2016-02-19       |  |  |  |
| 122                                                                             | Energy-Related Transaction<br>Credit Policy                | 2016-11-15               | Case No.<br>2016-00235 | 2016-08-26       |  |  |  |
| 122                                                                             | Addendum: Energy-Related<br>Transaction Credit Policy      | 2016-11-06               | Case No.<br>2016-00235 | 2016-08-26       |  |  |  |

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8 Witnesses) Mark W. McAdams (Coal) and

- 9 Wayne O'Bryan (Natural Gas)
- 10

Case No. 2017-00006 Response to PSC 1-32 Witnesses: Mark W. McAdams (*Coal*) and Wayne O'Bryan (*Natural Gas*) Page 3 of 3

## **Policy No. 111 – Hedge Policy**



Policy Number: 111

| Hedge Policy                                                                 |            |                   |            |       |  |
|------------------------------------------------------------------------------|------------|-------------------|------------|-------|--|
| Original Effective Date 07/16/2009 Date Last Reviewed 09/16/2016 Approved by |            |                   |            |       |  |
| Original Approval Date                                                       | 06/15/2007 | Date Last Revised | 09/16/2016 | BOARD |  |

#### 1. Objective

The Big Rivers Electric Corporation ("Big Rivers") Hedge Policy will guide disciplined hedging of forward natural gas, solid fuel, fuel oil and purchased power resources ("Commodity/Commodities"). This Hedge Policy is designed to reduce Member-Owners' wholesale rate volatility and to maintain rates within desired tolerances. The primary purpose of this policy is to identify specific time and volume (as a percent of total projected generation) criteria for procuring projected Commodity-related needs.

This policy largely employs a price-averaging strategy of declining percentage of Commodity supply positions held over forward time periods. This strategy protects Big Rivers from potential adverse impacts that could result in either significant Commodity price increases or decreases. The strategy also maintains some elements of procurement flexibility. For example, during times of extremely attractive market conditions, this policy allows for increasing the amount of forward Commodities hedged above the stated ranges with the concurrence of the Board of Directors ("Board"). A key component of the policy is a monthly compliance report for the Board, which is outlined herein.

Although this document is primarily concerned with managing Commodity costs and risks, a limited amount of discussion on capacity adequacy, transmission congestion risk, emission allowances and fuel transportation based on similar principles is included.

#### 2. Hedge Policy Criteria

The hedging criteria identified within this policy address the primary Commodity supply portfolio components that affect rates and reliability the most. Accordingly, the hedge criteria in the following sections represent the risk tolerance of Big Rivers and identify the processes Big Rivers will employ to manage these key Commodity supply risks.

#### a. Volumetric and Lead Time Criteria for Hedging

This policy employs a total Commodity hedging methodology whereby the MWh equivalent of all Commodity hedges are compared to the expected generation of Big Rivers. To apply as a Commodity hedge, fuel purchases must be combined with physical generation ownership or contracted capacity. The MWh equivalent hedge from fuel purchases will be the volume of mmBTUs of fuel procured for the unit or contract divided by the expected average heat rate of the generation unit or contract divided by 1,000. The total Commodity hedge is the MWh equivalent of the sum of fuel purchases and electricity purchases.

#### **Rolling Monthly Hedge Ranges**

One criteria of this policy is to have Commodities procured within defined volumetric ranges during the following rolling timeframes. These ranges identify the percentage of Big Rivers' projected total Commodity needs that will be procured with fixed price Commodities over a given time period. For purposes of this policy, Commodity needs are considered hedged or procured to the extent that the projected need is met by 1) authorized purchase transactions as defined in the Big Rivers Energy Related Transaction Authority Policy (Board Policy 105), or 2) authorized fuel transactions combined with physical generation unit ownership, heat rate transactions, or physical capacity transactions.



Policy Number: 111

| Hedge Policy            |            |                    |            |             |  |  |
|-------------------------|------------|--------------------|------------|-------------|--|--|
| Original Effective Date | 07/16/2009 | Date Last Reviewed | 09/16/2016 | Approved by |  |  |
| Original Approval Date  | 06/15/2007 | Date Last Revised  | 09/16/2016 | BOARD       |  |  |

Additionally, Commodity option transactions with out of the money strike prices may be used to hedge forward volumes, provided that they do not account for more than 15 percent of the projected Commodity needs in any given month, and they are not more than 50 percent out of the money at the time of the transaction.

| Lead<br>Time          | Months<br>1 thru 3 | Months<br>4 thru 12 | Quarters<br>5 thru 8 | Quarters<br>9 thru 12 | Years<br>4 thru 5 |
|-----------------------|--------------------|---------------------|----------------------|-----------------------|-------------------|
| Measurement<br>Period | Rolling            | Rolling             | Rolling              | Rolling               | Calendar<br>Year  |
| Hedging<br>Frequency  | Monthly            | Monthly             | Quarterly            | Quarterly             | Annual            |
| Range (%)             | 80-100             | 75-100              | 50-85                | 25-75                 | 0-50              |

For the above table, Big Rivers will hedge projected Commodity needs based on the following criteria:

- Lead Time: The amount of time from the current period. Defined in months, quarters, or years.
- <u>Measurement Period</u>: This is the mechanism under which this volumetric range is measured. There are two measures - rolling, where the measurement period changes monthly and calendar year, where the measurement period is only changed at the change of a calendar year. In the case of conflict, the rolling criterion has precedence over calendar year.
- <u>Hedging Frequency</u>: This is primarily useful in conjunction with the rolling measurement period. This is the frequency that the rolling measurement period changes for policy compliance reporting purposes. The hedging frequency period prevents, for example, a situation where the transaction execution staff would have to hedge month 36 (the last month of quarter 12) at a time where monthly purchases are very illiquid (not readily available).
- <u>Range</u>: This is the range of overall Commodity needs that will be hedged with fixed price Commodities, of which up to 15 percent may be covered with options...

Commodity procurements that deviate from the stated range will require approval of the Board, and will be part of the regular reporting to the Board.

Commodity hedging will be a complementary hedging activity since Big Rivers has natural gas and coalfired generation. Big Rivers may also hedge with Commodities if it enters a transaction that uses a natural gas, fuel oil, or coal index price to derive its electricity cost. Such natural gas, fuel oil, and coal-related generation or purchase transactions, while considered capacity, would not be considered Commodity hedges until the projected Commodity volumes are procured. In order to allow flexibility in overall Commodity hedging decisions, specific sub-targets for natural gas hedging are not set within this policy.



Policy Number: 111

#### **Hedge Policy**

|                                |            | •                  |            |             |
|--------------------------------|------------|--------------------|------------|-------------|
| <b>Original Effective Date</b> | 07/16/2009 | Date Last Reviewed | 09/16/2016 | Approved by |
| Original Approval Date         | 06/15/2007 | Date Last Revised  | 09/16/2016 | BOARD       |

#### b. MISO Resource Adequacy Requirements

Big Rivers will comply with all MISO capacity requirement rules.

#### c. Congestion Hedging with Financial Transmission Rights (FTR)

It will be Big Rivers' policy to actively participate in the MISO FTR allocation and auction process with a prudent and predetermined strategy for addressing the planning year congestion risk.

Big Rivers will target to mitigate a minimum of 50% of congestion risk (measured by annual native load and non-member sales requirements) prior to or by the end of the MISO annual FTR auction.

Big Rivers will target to mitigate a minimum of 70% of congestion risk prior to the month of delivery.

#### d. Emission Allowance Hedging

This hedging policy calls for the establishment of an emission allowance procurement process to meet expected future requirements. Fixed price hedges for emission allowances include 1) actual or expected emission allowances allocated to Big Rivers from the EPA, 2) fixed price allowance purchases and sales, and 3) projected, budgeted, and Board-approved emission control equipment additions. Big Rivers will price average into its emission allowance position when purchasing emission allowances. Emission allowance needs will be managed similar to its approach for Commodities. Big Rivers will maintain fixed price allowance hedges based on the following table.

| Lead<br>Time | Current<br>Calendar<br>Year | Calendar<br>Year<br>Two | Calendar<br>Year<br>Three |
|--------------|-----------------------------|-------------------------|---------------------------|
| Minimum (%)  | 80                          | 70                      | 60                        |

Per applicable regulatory requirements, Big Rivers will hold enough allowances in all compliance accounts to cover emissions for the current reporting period. Specifically, all compliance accounts shall be populated with sufficient allowances to cover emissions for the current reporting period prior to the accounts being closed by the EPA, which is currently two (2) consecutive calendar months after the end of the reporting period. Furthermore, the Designated Representative will ensure that all compliance accounts have an adequate number of allowances prior to running "Final Compliance True up" after the accounts have been closed by the EPA.

Big Rivers will not buy emission allowances from the market for any given year if it results in emission allowances that exceed 105 percent of its expected needs without prior CEO approval.

#### e. Resource Diversity Management

Big Rivers will manage its resource diversity concentration risks on a rolling 12-month basis by diversifying its Commodity supply resources as follows:



Policy Number: 111

|                         |            | Hedge Policy       |            |             |
|-------------------------|------------|--------------------|------------|-------------|
| Original Effective Date | 07/16/2009 | Date Last Reviewed | 09/16/2016 | Approved by |
| Original Approval Date  | 06/15/2007 | Date Last Revised  | 09/16/2016 | BOARD       |

Capacity resources (generation and purchased power contracts) shall not exceed 30 percent concentration from a single resource or supplier. Fuel supply contracts will be diversified such that no more than 40 percent (but not more than 1.5 million tons) will be from a single supplier that has the ability to source coal from multiple coal mining operations to supply Big Rivers for any rolling 12-month period. For fuel suppliers that have the ability to source coal from a single mining operation, no more than 25% (but not more than 1.0 million tons) will be from such supplier to supply Big Rivers for any rolling 12-month period.

Exceptions to these limits shall require approval of Big Rivers' Board.

#### f. Risk Measurement and Compliance Reporting

Risk measurement and policy compliance within the volumetric and lead time criteria will be provided to Big Rivers' Board monthly. This report will generally cover five years of projections.

#### Responsibility

It shall be the responsibility of the Board, CEO and IRMC to ensure compliance with this policy. Implementation of this policy shall adhere to the authority granted in the Energy Related Transaction Authority Policy (Board Policy 105).

| Number   | Date       | Notes                                                                                                                                                                                                                                                                                               | Approved by |
|----------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Original | 06/15/2007 | Approved to be effective at close of unwind                                                                                                                                                                                                                                                         | Board       |
| Rev 1    | 03/16/2012 | Update out-of-date language (joining MISO, old policy reference), general cleanup                                                                                                                                                                                                                   | Board       |
| Rev 2    | 09/18/2015 | Update terminology (I.E. energy to Commodity,<br>coal to solid fuel, electricity to purchased power),<br>removed Appendix A (out-of-date examples) and<br>Appendix B (no longer applicable), updated<br>emission allowance section to be more concise<br>and clarified resource diversity language. | Board       |
| Rev 3    | 09/16/2016 | Clarified Policy Reference                                                                                                                                                                                                                                                                          | Board       |

| gRivers              |            |                    |            |                   |                  |
|----------------------|------------|--------------------|------------|-------------------|------------------|
| ELECTRIC CORPORATION |            |                    | Policy Nu  | umber: <u>111</u> | _                |
|                      |            | Hedge Policy       |            |                   |                  |
| Original Effective   |            |                    |            | Approved by       |                  |
| Date                 | 07/16/2009 | Date Last Reviewed | 09/16/2016 | BOARD             | Deleted: 18/2015 |
| Original Approval    |            |                    |            |                   |                  |
| Date                 | 06/15/2007 | Date Last Revised  | 09/16/2016 |                   | Deleted: 18/2015 |

#### 1. Objective

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This policy largely employs a price-averaging strategy of declining percentage of Commodity supply positions held over forward time periods. This strategy protects Big Rivers from potential adverse impacts that could result in either significant Commodity price increases or decreases. The strategy also maintains some elements of procurement flexibility. For example, during times of extremely attractive market conditions, this policy allows for increasing the amount of forward Commodities hedged above the stated ranges with the concurrence of the Board of Directors ("Board"). A key component of the policy is a monthly compliance report for the Board, which is outlined herein.

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Page 1 of 5

| g Rivers                   |            |                    |            |                      |   |
|----------------------------|------------|--------------------|------------|----------------------|---|
|                            |            | Hedge Policy       | POlicy N   |                      | ] |
| Original Effective<br>Date | 07/16/2009 | Date Last Reviewed | 09/16/2016 | Approved by<br>BOARD |   |
| Original Approval<br>Date  | 06/15/2007 | Date Last Revised  | 09/16/2016 |                      |   |

transactions combined with physical generation unit ownership, heat rate transactions, or physical capacity transactions.

Additionally, Commodity option transactions with out of the money strike prices may be used to hedge forward volumes, provided that they do not account for more than 15 percent of the projected Commodity needs in any given month, and they are not more than 50 percent out of the money at the time of the transaction.

| Lead<br>Time          | Months<br>1 thru 3 | Months<br>4 thru 12 | Quarters<br>5 thru 8 | Quarters<br>9 thru 12 | Years<br>4 thru 5 |
|-----------------------|--------------------|---------------------|----------------------|-----------------------|-------------------|
| Measurement<br>Period | Rolling            | Rolling             | Rolling              | Rolling               | Calendar<br>Year  |
| Hedging<br>Frequency  | Monthly            | Monthly             | Quarterly            | Quarterly             | Annual            |
| Range (%)             | 80-100             | 75-100              | 50-85                | 25-75                 | 0-50              |

For the above table, Big Rivers will hedge projected Commodity needs based on the following criteria:

- · Lead Time: The amount of time from the current period. Defined in months, quarters, or years.
- <u>Measurement Period</u>: This is the mechanism under which this volumetric range is measured. There are two measures - rolling, where the measurement period changes monthly and calendar year, where the measurement period is only changed at the change of a calendar year. In the case of conflict, the rolling criterion has precedence over calendar year.
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| ELECTRIC CORPORATION |            |                    |            | D POLICY    |                  |
|----------------------|------------|--------------------|------------|-------------|------------------|
|                      |            | Hedge Policy       |            |             | ]                |
| Original Effective   |            |                    |            | Approved by | -                |
| Date                 | 07/16/2009 | Date Last Reviewed | 09/16/2016 | BOARD       | Deleted: 18/2015 |
| Original Approval    |            |                    |            |             |                  |
| Date                 | 06/15/2007 | Date Last Revised  | 09/16/2016 |             | Deleted: 18/2015 |

hedges until the projected Commodity volumes are procured. In order to allow flexibility in overall Commodity hedging decisions, specific sub-targets for natural gas hedging are not set within this policy.

#### b. MISO Resource Adequacy Requirements

Big Rivers will comply with all MISO capacity requirement rules.

#### c. Congestion Hedging with Financial Transmission Rights (FTR)

It will be Big Rivers' policy to actively participate in the MISO FTR allocation and auction process with a prudent and predetermined strategy for addressing the planning year congestion risk.

Big Rivers will target to mitigate a minimum of 50% of congestion risk (measured by annual native load and non-member sales requirements) prior to or by the end of the MISO annual FTR auction.

Big Rivers will target to mitigate a minimum of 70% of congestion risk prior to the month of delivery.

#### d. Emission Allowance Hedging

This hedging policy calls for the establishment of an emission allowance procurement process to meet expected future requirements. Fixed price hedges for emission allowances include 1) actual or expected emission allowances allocated to Big Rivers from the EPA, 2) fixed price allowance purchases and sales, and 3) projected, budgeted, and Board-approved emission control equipment additions. Big Rivers will price average into its emission allowance position when purchasing emission allowances. Emission allowance needs will be managed similar to its approach for Commodities. Big Rivers will maintain fixed price allowance hedges based on the following table.

| Lead<br>Time | Current<br>Calendar<br>Year | Calendar<br>Year<br>Two | Calendar<br>Year<br>Three |
|--------------|-----------------------------|-------------------------|---------------------------|
| Minimum (%)  | 80                          | 70                      | 60                        |

Per applicable regulatory requirements, Big Rivers will hold enough allowances in all compliance accounts to cover emissions for the current reporting period. Specifically, all compliance accounts shall be populated with sufficient allowances to cover emissions for the current reporting period prior to the accounts being closed by the EPA, which is currently two (2) consecutive calendar months after the end of the reporting period. Furthermore, the Designated Representative will ensure that all compliance accounts have an adequate number of allowances prior to running "Final Compliance True up" after the accounts have been closed by the EPA.

| gRivers              |            |                    | BOAR       | POLICY            |                  |
|----------------------|------------|--------------------|------------|-------------------|------------------|
| ELECTRIC CORPORATION |            |                    | Policy N   | umber: <u>111</u> |                  |
|                      |            | Hedge Policy       |            |                   |                  |
| Original Effective   |            |                    |            | Approved by       |                  |
| Date                 | 07/16/2009 | Date Last Reviewed | 09/16/2016 | BOARD             | Deleted: 18/2015 |
| Original Approval    |            |                    |            | 1                 |                  |
| Date                 | 06/15/2007 | Date Last Revised  | 09/16/2016 |                   |                  |

Big Rivers will not buy emission allowances from the market for any given year if it results in emission allowances that exceed 105 percent of its expected needs without prior CEO approval.

#### e. Resource Diversity Management

Big Rivers will manage its resource diversity concentration risks on a rolling 12-month basis by diversifying its Commodity supply resources as follows:

Capacity resources (generation and purchased power contracts) shall not exceed 30 percent concentration from a single resource or supplier. Fuel supply contracts will be diversified such that no more than 40 percent (but not more than 1.5 million tons) will be from a single supplier that has the ability to source coal from multiple coal mining operations to supply Big Rivers for any rolling 12-month period. For fuel suppliers that have the ability to source coal from a single mining operation, no more than 25% (but not more than 1.0 million tons) will be from such supplier to supply Big Rivers for any rolling 12-month period.

Exceptions to these limits shall require approval of Big Rivers' Board.

#### f. Risk Measurement and Compliance Reporting

Risk measurement and policy compliance within the volumetric and lead time criteria will be provided to Big Rivers' Board monthly. This report will generally cover five years of projections.

#### Responsibility

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It shall be the responsibility of the Board, CEO and IRMC to ensure compliance with this policy. Implementation of this policy shall adhere to the authority granted in the Energy Related Transaction Authority Policy (Board Policy 105).

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| Original | 06/15/2007 | Approved to be effective at close of unwind                                                                                                                                                          | Board       |
| Rev 1    | 03/16/2012 | Update out-of-date language (joining MISO, old policy reference), general cleanup                                                                                                                    | Board       |
| Rev 2    | 09/18/2015 | Update terminology (I.E. energy to Commodity,<br>coal to solid fuel, electricity to purchased power),<br>removed Appendix A (out-of-date examples) and<br>Appendix B (no longer applicable), updated | Board       |

|                    |            | Hedge Policy       |            |             |                         |
|--------------------|------------|--------------------|------------|-------------|-------------------------|
| Original Effective |            |                    |            | Approved by |                         |
| Date               | 07/16/2009 | Date Last Reviewed | 09/16/2016 | BOARD       | Deleted: 18/2015        |
| Original Approval  |            |                    |            |             |                         |
| Date               | 06/15/2007 | Date Last Revised  | 09/16/2016 |             | <b>Deleted:</b> 18/2015 |

# **Policy No. 120 – Fuel Procurement Policies and Procedures**







Policy Number: 120

| Fuel Procurement Policies and Procedures |            |                    |            |             |  |
|------------------------------------------|------------|--------------------|------------|-------------|--|
| Original Effective Date                  | 07/16/2009 | Date Last Reviewed | 09/16/2016 | Approved by |  |
| <b>Original Approval Date</b>            | 12/20/2007 | Date Last Revised  | 09/16/2016 | BOARD       |  |

#### Policy Purpose

The purpose of Big Rivers Electric Corporation ("Big Rivers") Fuel Procurement Policies and Procedures is to present the principles that govern the procurement of fuel, reagent, and associated transportation. This policy 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. <u>Definitions</u>:

- 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 Big Rivers' 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 Big Rivers' granted authority limits outlined in the Energy Related Transaction Authority Policy (Board Policy 105).
- 3. "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.
- 4. "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.
- 5. "Department" means the Big Rivers' Fuels Procurement Department.
- 6. "Director" means the Big Rivers' Director Fuels Procurement.
- 7. "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 Big Rivers facilities.
- 8. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Big Rivers' generating units.
- 9. "Fuel" means combustibles purchased by Big Rivers for one or more of its generating stations.
- 10. "VP Production" means Big Rivers' principal individual responsible for power generation and fuel procurement, among other duties.



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| <b>Original Effective Date</b> | 07/16/2009 | Date Last Reviewed | 09/16/2016 | Approved by |  |
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| Original Approval Date         | 12/20/2007 | Date Last Revised  | 09/16/2016 | BOARD       |  |

- 11. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
- 12. "Spot Contract" is a type of agreement that may be issued by Big Rivers for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
- 13. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of Big Rivers 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.
- 14. "Station" means one of Big Rivers' generating facilities.
- 15. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
- 16. "Unit" means a generating unit at a station.
- 17. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

#### B. <u>Fuel Procurement Policies</u>:

This policy provides guidance to ensure 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 Big Rivers' obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. Big Rivers 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 Big Rivers. The 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 will review this policy and recommend updates as appropriate.

#### C. <u>Organization</u>:

1. <u>Department Structure</u>. The Department shall be organized and staffed to effectively administer Big Rivers' fuel procurement function.



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- 2. <u>Organizational Responsibility</u>. The VP Production 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 VP Production considers advisable in the execution of the functions of the Department.
- 3. <u>Approval Authority (Award Recommendation</u>). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Director which is specified in the Energy Related Transaction Authority Policy (Board Policy 105). The Award Recommendation will be drafted by the Director. Contractual agreements and amendments for procurement shall be reviewed by Fuels legal counsel, and executed by the VP Production within the authority granted by the Energy Related Transaction Authority Policy (Board Policy 105). Greater expenditures shall require the signature of Big Rivers' President and Chief Executive Officer when such expenditure is within his trading authority as established by the Board of Directors ("Board"). These levels of authority may be amended, supplemented, or superseded as dictated by Big Rivers.
- 4. <u>Reports.</u> 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. <u>Records.</u> The Department shall maintain the following records:
  - a. <u>Open Contract Files.</u> 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 Big Rivers (as applicable).
    - 3. A list containing current suppliers and known potential Suppliers of fuel.
  - b. <u>Closed Contract Files.</u> The Department shall maintain its files according to Big Rivers' record retention plan.
- 6. <u>General Administrative Duties.</u> 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.



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#### D. <u>Fuel Supply Procedures</u>:

- 1. <u>Projections.</u> In conjunction with other departments of Big Rivers, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in Big Rivers' planning process.
- 2. <u>Contract/Spot Mix.</u> Subject to the approval of the VP Production, 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 Big Rivers), (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 this policy and (f) fuel impact on generation facilities' operation and maintenance.
- 3. <u>Current Requirements.</u> 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 Big Rivers.
- 4. <u>Supplier Qualifications.</u> Big Rivers 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, Big Rivers shall purchase its fuel and reagent through sealed bid solicitations; however, Big Rivers 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 Big Rivers foregoes the solicitation process, documentation shall be appended to the resulting purchase order file describing the conditions. 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



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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 VP Production and Director or their representative in their absence, and another selected representative outside of the 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. <u>Contract Awards.</u> 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 Big Rivers 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.

All contracts for which the term, tenor or notional amount exceed the limits specified for the Director must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy (Board Policy 105).

- 7. <u>Spot Purchases</u>. Spot purchases may be made by Big Rivers whenever considered advisable by the Director in furtherance of Big Rivers' fuel and reagent needs, subject to the limit of authority as outlined by Energy Related Transaction Authority Policy (Board Policy 105).
- 8. <u>Documentation</u>. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of Big Rivers. 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



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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. <u>Fuel Oil</u>. 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 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 Department for those purchases initiated and completed by the Department.

#### E. Fuel Supply and Reagent Agreement Administration:

- 1. <u>Compliance</u>. The Department shall review and analyze daily business and operational reports to properly administer all fuel and transportation agreements.
- 2. <u>Coal weights.</u> Coal weights shall be obtained by either Big Rivers or by Supplier, upon agreement by Big Rivers. Coal weight is obtained by scale or draft method, depending upon Big Rivers' 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, Big Rivers 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. <u>Coal sampling.</u> Coal sampling and analysis shall be performed by either Big Rivers or the Supplier, upon agreement by Big Rivers. Coal sampling and analysis shall be performed according to procedures adopted by Big Rivers' 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 Big Rivers' laboratory personnel or is provided by the Supplier pursuant to the contract agreement.
- 4. <u>Amendments.</u> A contract shall not be materially amended except after analysis by the Department and recommendation of the Director or the VP Production. No material contract or purchase order addendum shall be made except upon legal review of such amendment, recommendation of the Director and the approval of the VP Production pursuant to the limits of the Energy Related Transaction Authority Policy (Board Policy 105). Amendments to contracts that were originally approved by the Board shall also be approved by the Board.
- 5. <u>Contract Administration</u>. 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



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Director. After review by the Director, the supplier request and Department's recommendations shall be approved as required by Big Rivers. If any request is not approved in whole or in part, the Director shall advise the supplier, specifying Big Rivers' objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Big Rivers as dictated by contract terms shall be the primary method of resolving the issue.

- 6. <u>Force Majeure.</u> 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 Big Rivers' legal counsel.
- 7. <u>Inspections.</u> 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. <u>General Enforcement Policy</u>. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by Big Rivers in a reasonable, fair, and practical manner to achieve supplier compliance with Big Rivers' overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
- 2. <u>Director Responsibility</u>. 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 VP Production and the Director may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
- 3. <u>Legal Assistance.</u> The Department shall have access to, and shall receive advice from, legal counsel as provided by Big Rivers 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:

Big Rivers has an obligation to ensure continuous low cost, reliable service to its Member-Owners. Decisions affecting fuel inventory shall consider these obligations.

Big Rivers 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



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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 Senior Management and shall be in accordance with or modify concurrently Solid Fuel Inventory Policy (Board Policy 121).

Solid fuel inventories and reagent shall be monitored and reported regularly via Big Rivers' fuel information system(s).

#### H. <u>Emergency Procurement</u>:

Any one or more of the procedures described herein may be waived by the VP Production, 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 Big Rivers 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. <u>Transportation Services Contracts</u>:

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 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 Big Rivers.

#### J. <u>Ethics and Conduct</u>:

Big Rivers recognizes the importance of following appropriate business ethics to guide the conduct of the Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of Big Rivers including, but not limited to, the Board of Directors Ethics Policy (Board Policy 102) and the Conflicts of Interest Policy (Board Policy 108) for Big Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.



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| Original Approval Date 12/20/2007 Date Last Revised 09/16/2016 BOARD |            |                    |            |             |  |  |

Fuels staff shall endeavor to serve the best interests of Big Rivers, its Member-Owners, and stakeholders in the performance of their duties and responsibilities.

| Number Date |                                                              | er Date Notes                                                                                                                    |                      |
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| Original    | riginal 12/21/2007 Approved to be effective at close of unwi |                                                                                                                                  | Approved by<br>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       | 03/21/2014                                                   | Add date last reviewed line, section header and change "mmBTU" to "gallon"                                                       | Board                |
| Rev 4       | 09/19/2014                                                   | Change Chief Operating Officer to VP<br>Production                                                                               | Board                |
| Rev 5       | 08/21/2015                                                   |                                                                                                                                  |                      |
| Rev 6       | 09/16/2016                                                   | Unified all references to Big Rivers Electric<br>Corporation to Big Rivers, clarified policy<br>references, minor wording change | Board                |

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- 3. "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.
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- <u>6.</u> "Director" means the Big Rivers' Director Fuels Procurement.
   7. "Emergency" means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining
- 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 Big Rivers facilities.
- 8. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Big Rivers' generating units.
- 9. "Fuel" means combustibles purchased by Big Rivers for one or more of its generating stations.

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| Original Effective                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                            | Date Last                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                        | Approved by                                                                                                                                                                                                                 |                                                                                                                                                                                                      |
| Date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 07/16/2009                                                                                                                                                                                                                                                                                                                                                                                 | Reviewed                                                                                                                                                                                                                                                                                                                                                                                    | 09/16/2016                                                                                                                                                                                                                                                                                                                                                             | BOARD                                                                                                                                                                                                                       | Deleted: 08/21/2015                                                                                                                                                                                  |
| Original Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             |                                                                                                                                                                                                      |
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| 10. "VP Production                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | on" means Big Riv<br>ent, among other d                                                                                                                                                                                                                                                                                                                                                    | vers' principal individua                                                                                                                                                                                                                                                                                                                                                                   | al responsible for power                                                                                                                                                                                                                                                                                                                                               | generation and                                                                                                                                                                                                              | <b>Deleted:</b> 11                                                                                                                                                                                   |
| ruer procurem                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | ent, among other d                                                                                                                                                                                                                                                                                                                                                                         | uties.                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             | Deleted: the Company's                                                                                                                                                                               |
| 11. "Solicitation"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | means the process                                                                                                                                                                                                                                                                                                                                                                          | of soliciting bids (writt                                                                                                                                                                                                                                                                                                                                                                   | ten or oral) for the suppl                                                                                                                                                                                                                                                                                                                                             | ly of fuel, reagent,                                                                                                                                                                                                        | <b>Deleted:</b> 12                                                                                                                                                                                   |
| and/or related                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | transportation serv                                                                                                                                                                                                                                                                                                                                                                        | rices.                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             |                                                                                                                                                                                                      |
| 12. "Spot Contrac                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | t" is a type of agree                                                                                                                                                                                                                                                                                                                                                                      | ement that may be issue                                                                                                                                                                                                                                                                                                                                                                     | ed by Big Rivers for the                                                                                                                                                                                                                                                                                                                                               | supply of fuel.                                                                                                                                                                                                             | Deleted: 13                                                                                                                                                                                          |
| reagent, or rela                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | ated transportation                                                                                                                                                                                                                                                                                                                                                                        | of such with a term of                                                                                                                                                                                                                                                                                                                                                                      | typically one year or les                                                                                                                                                                                                                                                                                                                                              | s.                                                                                                                                                                                                                          | Deleted: the Company                                                                                                                                                                                 |
| 13. "Spot Purchase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | e" means any nural                                                                                                                                                                                                                                                                                                                                                                         | hase of fuel reagant or                                                                                                                                                                                                                                                                                                                                                                     | related transportation of                                                                                                                                                                                                                                                                                                                                              | n hehelf of Di-                                                                                                                                                                                                             |                                                                                                                                                                                                      |
| Rivers where t                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | he terms and cond                                                                                                                                                                                                                                                                                                                                                                          | itions are incorporated                                                                                                                                                                                                                                                                                                                                                                     | in the Letter Agreement                                                                                                                                                                                                                                                                                                                                                | , Purchase Order                                                                                                                                                                                                            | Deleted: 14                                                                                                                                                                                          |
| or Spot Contra                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | ect and the term is t                                                                                                                                                                                                                                                                                                                                                                      | typically of one year or                                                                                                                                                                                                                                                                                                                                                                    | less.                                                                                                                                                                                                                                                                                                                                                                  | ,                                                                                                                                                                                                                           | Deleted: the Company                                                                                                                                                                                 |
| 14. "Station" mean                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | is one of Big River                                                                                                                                                                                                                                                                                                                                                                        | s' generating facilities.                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             | Deletedu 16                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                        | <                                                                                                                                                                                                                           | Deleted: 15                                                                                                                                                                                          |
| 15. "Supplier" mea                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | ans the seller or co                                                                                                                                                                                                                                                                                                                                                                       | unterparty to an agreem                                                                                                                                                                                                                                                                                                                                                                     | nent who is obligated to                                                                                                                                                                                                                                                                                                                                               | comply with and                                                                                                                                                                                                             | Deleted: 16                                                                                                                                                                                          |
| fulfill the agree                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | ement's terms and                                                                                                                                                                                                                                                                                                                                                                          | conditions.                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             |                                                                                                                                                                                                      |
| 16. "Unit" means a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | a generating unit at                                                                                                                                                                                                                                                                                                                                                                       | a station                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             |                                                                                                                                                                                                      |
| To. Ont means a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Benerating anne at                                                                                                                                                                                                                                                                                                                                                                         | a station.                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             | Deleted: 17                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                             |                                                                                                                                                                                                      |
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| 17. <u>"Unit bus bar o</u><br>with burning th                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | cost" is the total va<br>ne fuel.                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                             | ncluding the maintenan                                                                                                                                                                                                                                                                                                                                                 | ce cost associated                                                                                                                                                                                                          |                                                                                                                                                                                                      |
| 17. <u>"Unit bus bar</u><br>with burning th                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | cost" is the total va<br>ne fuel.                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                             | ncluding the maintenan                                                                                                                                                                                                                                                                                                                                                 | ce cost associated                                                                                                                                                                                                          |                                                                                                                                                                                                      |
| <ul> <li><u>17.</u> "Unit bus bar of with burning the burning the burning the burning the burning the burner of the</li></ul> | cost" is the total va<br>ne fuel.<br>nent Policies:<br>ovides guidance to                                                                                                                                                                                                                                                                                                                  | riable production cost i<br>ensure an adequate sup                                                                                                                                                                                                                                                                                                                                          | ply of fuel and reagent                                                                                                                                                                                                                                                                                                                                                | of sufficient                                                                                                                                                                                                               |                                                                                                                                                                                                      |
| <ul> <li>17. "Unit bus bar of with burning the with burning the burning th</li></ul>      | cost" is the total va<br>ne fuel.<br>nent Policies:<br>pvides guidance to,<br>nost competitive ov                                                                                                                                                                                                                                                                                          | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on                                                                                                                                                                                                                                                                                                              | ply of fuel and reagent<br>a unit bus bar basis cor                                                                                                                                                                                                                                                                                                                    | of sufficient                                                                                                                                                                                                               | Deleted: 18                                                                                                                                                                                          |
| <ul> <li>17. "Unit bus bar of with burning the with burning the burning th</li></ul>      | cost" is the total va<br>ne fuel.<br><b>ment Policies:</b><br>voides guidance to,<br>nost competitive ov<br>ions to provide add                                                                                                                                                                                                                                                            | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv                                                                                                                                                                                                                                                                                  | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to                                                                                                                                                                                                                                                                                        | of sufficient<br>isistent with Big<br>meet operational                                                                                                                                                                      | Deleted: 18 Deleted: The Company's fuel procureme                                                                                                                                                    |
| <ul> <li>17. "Unit bus bar of with burning the with burning the burning th</li></ul>      | cost" is the total va<br>he fuel.<br>ment Policies:<br>wides guidance to,<br>nost competitive ov<br>ions to provide ade<br>ntal standards, and                                                                                                                                                                                                                                             | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv<br>to meet any other appl                                                                                                                                                                                                                                                        | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to<br>icable legal requiremen                                                                                                                                                                                                                                                             | of sufficient<br>isistent with Big<br>meet operational<br>ts. Big Rivers                                                                                                                                                    | Deleted: 18<br>Deleted: The Company's fuel procureme<br>Deleted: is                                                                                                                                  |
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| <ul> <li><b>17.</b> "Unit bus bar of with burning the with burning the burning</li></ul>  | cost" is the total va<br>he fuel.<br>ment Policies:<br>wides guidance to,<br>host competitive ov<br>ions to provide addental standards, and<br>t efforts to secure i<br>such.                                                                                                                                                                                                              | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv<br>to meet any other appl<br>ts fuel and reagent supp                                                                                                                                                                                                                            | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to<br>icable legal requiremen<br>ply at competitive prices                                                                                                                                                                                                                                | of sufficient<br>isistent with Big<br>meet operational<br>ts. Big Rivers<br>s through                                                                                                                                       | Deleted: 18<br>Deleted: The Company's fuel procureme<br>Deleted: is<br>Deleted: obtain<br>Deleted: the Company's<br>Deleted: The Company                                                             |
| <ul> <li><u>17.</u> "Unit bus bar of with burning the with burning the burning /li></ul>  | cost" is the total va<br>he fuel.<br><b>ment Policies:</b><br>wides guidance to,<br>host competitive ov<br>ions to provide addental<br>standards, and<br>t efforts to secure i<br>such.<br>h of this policy is o<br>staffed, and fuel pr                                                                                                                                                   | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv<br>to meet any other appl<br>ts fuel and reagent supp<br>f highest priority to Big<br>ocurement procedures a                                                                                                                                                                     | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to r<br>icable legal requiremen<br>ply at competitive prices<br>g Rivers. The Departme<br>and administration shall                                                                                                                                                                        | of sufficient<br>sistent with Big<br>meet operational<br>ts. Big Rivers<br>s through<br>nt shall be<br>be conducted, in                                                                                                     | Deleted: 18<br>Deleted: The Company's fuel procureme<br>Deleted: is<br>Deleted: obtain<br>Deleted: the Company's<br>Deleted: The Company<br>Deleted: the Company                                     |
| <ul> <li><u>417.</u> "Unit bus bar of with burning the with burning the burning /li></ul> | cost" is the total va<br>he fuel.<br><b>ment Policies:</b><br>wides guidance to,<br>nost competitive ov<br>ions to provide addental<br>standards, and<br>t efforts to secure i<br>such.<br>n of this policy is of<br>staffed, and fuel pr<br>l practical manner                                                                                                                            | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv<br>to meet any other appl<br>ts fuel and reagent supp<br>of highest priority to Big<br>ocurement procedures a<br>consistent with this pol                                                                                                                                        | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to<br>icable legal requiremen<br>ply at competitive prices<br>g <u>Rivers.</u> The Departme<br>and administration shall<br>icy. Fuel, reagent, and r                                                                                                                                      | of sufficient<br>isistent with Big<br>meet operational<br>ts. Big Rivers<br>s through<br>nt shall be<br>be conducted, in<br>elated                                                                                          | Deleted: 18<br>Deleted: The Company's fuel procureme<br>Deleted: is<br>Deleted: obtain<br>Deleted: the Company's<br>Deleted: The Company                                                             |
| <ul> <li><b>17.</b> "Unit bus bar of with burning the with burning the second se</li></ul> | cost" is the total va<br>ne fuel.<br><b>ment Policies:</b><br>wides guidance to,<br>nost competitive ov<br>ions to provide addental<br>standards, and<br>t efforts to secure i<br>such.<br>n of this policy is of<br>staffed, and fuel pr<br>l practical manner<br>shall be purchased                                                                                                      | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv<br>to meet any other appl<br>ts fuel and reagent supp<br>of highest priority to Big<br>ocurement procedures a<br>consistent with this pol<br>at competitive prices co                                                                                                            | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to r<br>icable legal requiremen<br>ply at competitive prices<br>g <u>Rivers.</u> The Departme<br>and administration shall<br>icy. Fuel, reagent, and r<br>onsidering all material f                                                                                                       | of sufficient<br>isistent with Big<br>meet operational<br>ts. Big Rivers<br>s through<br>nt shall be<br>be conducted, in<br>elated<br>actors. The                                                                           | Deleted: 18<br>Deleted: The Company's fuel procureme<br>Deleted: is<br>Deleted: obtain<br>Deleted: the Company's<br>Deleted: The Company<br>Deleted: the Company                                     |
| <ul> <li>"Unit bus bar of with burning the with burning the second s</li></ul>      | cost" is the total van<br>he fuel.<br><b>nent Policies:</b><br>wides guidance to,<br>nost competitive ov<br>ions to provide ade<br>ntal standards, and<br>t efforts to secure i<br>such.<br>n of this policy is of<br>staffed, and fuel pr<br>l practical manner<br>shall be purchased<br>but are not limited<br>sure generating un                                                        | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv<br>to meet any other appl<br>ts fuel and reagent supp<br>of highest priority to Big<br>ocurement procedures a<br>consistent with this pol<br>at competitive prices co<br>to: quantity needed to<br>it operating and mainte                                                       | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to r<br>icable legal requiremen<br>ply at competitive prices<br>g Rivers. The Departme<br>and administration shall<br>icy. Fuel, reagent, and r<br>onsidering all material f<br>maintain an adequate su<br>nance characteristics an                                                       | of sufficient<br>isistent with Big<br>meet operational<br>ts. Big Rivers<br>s through<br>int shall be<br>be conducted, in<br>elated<br>actors. The<br>upply, quality<br>id environmental                                    | Deleted: 18<br>Deleted: The Company's fuel procureme<br>Deleted: is<br>Deleted: obtain<br>Deleted: the Company's<br>Deleted: The Company<br>Deleted: the Company                                     |
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| <ul> <li><b>Fuel Procuren</b></li> <li><b>Fuel Procuren</b></li> <li><b>This policy pro</b>quality at the m<br/>Rivers' obligat<br/>and environme<br/>will use its best<br/>solicitation for</li> <li>Implementation<br/>organized and s<br/>an efficient and<br/>transportation s<br/>factors include<br/>necessary to en<br/>standards, relia<br/>system requirer</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | cost" is the total vane fuel.<br>ment Policies:<br>evides guidance to,<br>nost competitive ovides to provide ade<br>ntal standards, and<br>t efforts to secure i<br>such.<br>n of this policy is of<br>staffed, and fuel pri-<br>d practical manner<br>shall be purchased<br>but are not limited<br>sure generating un<br>bility of the suppli-<br>ments, and meeting<br>itions. From time | riable production cost i<br>ensure an adequate sup<br>verall evaluated cost on<br>equate and reliable serv<br>to meet any other appl<br>ts fuel and reagent supp<br>of highest priority to Big<br>ocurement procedures a<br>consistent with this pol<br>at competitive prices co<br>to: quantity needed to<br>it operating and mainte<br>er, creditworthiness, an<br>gemergency or other ur | ply of fuel and reagent<br>a unit bus bar basis cor<br>ice to its customers, to<br>icable legal requiremen<br>ply at competitive prices<br>g Rivers. The Departme<br>and administration shall<br>icy. Fuel, reagent, and r<br>onsidering all material f<br>maintain an adequate su<br>nance characteristics an<br>d forward planning to                                | of sufficient<br>isistent with Big<br>meet operational<br>ts. Big Rivers<br>s through<br>it shall be<br>be conducted, in<br>elated<br>actors. The<br>ipply, quality<br>d environmental<br>neet projected<br>at might affect | Deleted: 18<br>Deleted: The Company's fuel procureme<br>Deleted: is<br>Deleted: obtain<br>Deleted: the Company's<br>Deleted: The Company<br>Deleted: the Company<br>Deleted: Fuels                   |

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| 20  | ELECTRIC CO       | RPORATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| C ELECTRIC CORPORATION |                    |                    | Policy N     | lumber: <u>120</u> |                     |
|------------------------|--------------------|--------------------|--------------|--------------------|---------------------|
|                        | <b>Fuel Procur</b> | ement Policies and | d Procedures |                    |                     |
| Original Effective     |                    | Date Last          |              | Approved by        |                     |
| Date                   | 07/16/2009         | Reviewed           | 09/16/2016   | BOARD              | Deleted: 08/21/2015 |
| Original Approval      |                    |                    |              | 1                  |                     |
| Date                   | 12/20/2007         | Date Last Revised  | ,09/16/2016  |                    | Deleted: 08/21/2015 |

| 1.       | Department Structure. The Department shall be organized and staffed to effectively administer Big Rivers' fuel procurement function.                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Deleted: the Company's                                            |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| 2.       | <u>Organizational Responsibility</u> . The VP Production 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 VP Production considers advisable in the execution of the functions of the Department.                                                                                                                                                                                                                                   | Burecca. and Company's                                            |
| 3.       | <u>Approval Authority (Award Recommendation)</u> . An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Director which is specified in the Energy Related Transaction Authority Policy (Board Policy 105). The Award Recommendation will be drafted by the Director. Contractual agreements and                                                                                                                                                                                                                    | Deleted: of Fuels Deleted: single transaction authority limits by |
|          | amendments for procurement shall be reviewed by Fuels legal counsel, and executed by the VP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | the Company.                                                      |
|          | Production within the authority granted by the Energy Related Transaction Authority Policy <sub>e</sub> (Board Policy 105). Greater expenditures shall require the signature of Big Rivers' President and                                                                                                                                                                                                                                                                                                                                                                                         | Deleted:                                                          |
|          | Chief Executive Officer when such expenditure is within his trading authority as established by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deleted: the Company's                                            |
|          | the Board of Directors ("Board"). These levels of authority may be amended, supplemented, or                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Deleted:                                                          |
|          | superseded as dictated by Big Rivers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Deleted: the Company                                              |
| 4.<br>5. | 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:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Formatted: Underline                                              |
|          | a. <u>Open Contract Files.</u> 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:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                   |
|          | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Deleted: 1                                                        |
|          | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> <li>b) General correspondence;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deleted: 1                                                        |
|          | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> <li>b) General correspondence;</li> <li>c) Invoices and invoice verification data;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                      | Deleted: 1                                                        |
|          | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> <li>b) General correspondence;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deleted: 1                                                        |
|          | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> <li>b) General correspondence;</li> <li>c) Invoices and invoice verification data;</li> <li>d) Delivery records and quality analyses data;</li> </ul>                                                                                                                                                                                                                                                                                                                                              | Deleted: 1 Deleted: the Company                                   |
|          | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> <li>b) General correspondence;</li> <li>c) Invoices and invoice verification data;</li> <li>d) Delivery records and quality analyses data;</li> <li>e) Inspection reports and other data.</li> </ul> 2. A record of transportation equipment owned or leased by Big Rivers (as applicable).                                                                                                                                                                                                        |                                                                   |
| ۷        | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> <li>b) General correspondence;</li> <li>c) Invoices and invoice verification data;</li> <li>d) Delivery records and quality analyses data;</li> <li>e) Inspection reports and other data.</li> </ul> 2. A record of transportation equipment owned or leased by Big Rivers (as applicable). 3. A list containing current suppliers and known potential Suppliers of fuel. b. <u>Closed Contract Files.</u> The Department shall maintain its files according to Big Rivers' record retention plan. | Deleted: the Company                                              |
| •<br>6.  | <ul> <li>a) Contract documents, amendments, purchase orders and escalation documentation;</li> <li>b) General correspondence;</li> <li>c) Invoices and invoice verification data;</li> <li>d) Delivery records and quality analyses data;</li> <li>e) Inspection reports and other data.</li> </ul> 2. A record of transportation equipment owned or leased by Big Rivers (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 Big Rivers'                               | Deleted: the Company<br>Deleted: the Company's                    |

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| C ELECTRIC CORPORATIO |              |                   | Policy N     | lumber: <u>120</u> |                     |
|                       | Fuel Procure | ement Policies an | d Procedures |                    |                     |
| Original Effective    |              | Date Last         |              | Approved by        |                     |
| Date                  | 07/16/2009   | Reviewed          | ,09/16/2016  | BOARD              | Deleted: 08/21/2015 |
| Original Approval     |              |                   |              |                    |                     |
| Date                  | 12/20/2007   | Date Last Revised | ,09/16/2016  |                    | Deleted: 08/21/2015 |

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:

- Projections. In conjunction with other departments of Big Rivers, the Department shall prepare 1. Deleted: the Company annually a projection of fuel usage and cost at each Station for the number of years required for use in Big Rivers' planning process. Deleted: the Company's 2. Contract/Spot Mix. Subject to the approval of the VP Production, 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 Big Deleted: the Company Rivers), (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 this policy and (f) fuel impact on Deleted: the Company's Fuel Procurement generation facilities' operation and maintenance. Policy 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 Big Rivers. Deleted: the Company
  - 4. <u>Supplier Qualifications. Big Rivers shall select potential suppliers on the basis of evaluation</u>, 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. <u>Solicitations.</u> 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, Big Rivers shall purchase its fuel and reagent through sealed bid solicitations; however, Big Rivers 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 Big Rivers foregoes the solicitation process, documentation shall be appended to the resulting purchase order file describing the conditions.

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|                      | Fuel Procur  | ement Policies and | Procedures  |                  |                         |
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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 VP Production and Director or their representative in their absence, and another selected representative outside of the 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.

<u>Contract Awards.</u> 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.

6.

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 Big Rivers 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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| Fuel Procurement Policies and Procedures |            |                   | ]           |             |   |                     |  |
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All contracts for which the term, tenor or notional amount exceed the limits specified for the Director must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy (Board Policy 105).

- Spot Purchases. Spot purchases may be made by Big Rivers whenever considered advisable by the Director in furtherance of Big Rivers' fuel and reagent needs, subject to the limit of authority as outlined by Energy Related Transaction Authority Policy (Board Policy 105).
- 8. Documentation. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of Big Rivers. 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. <u>Fuel Oil</u>. 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 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 Department for those purchases initiated and completed by the Department.

#### E. Fuel Supply and Reagent Agreement Administration:

- 1. <u>Compliance</u>. 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 Big Rivers or by Supplier, upon agreement by Big Rivers. Coal weight is obtained by scale or draft method, depending upon Big Rivers' 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, Big Rivers 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. <u>Coal sampling</u>. Coal sampling and analysis shall be performed by either Big Rivers or the Supplier, upon agreement by Big Rivers. Coal sampling and analysis shall be performed according to procedures adopted by Big Rivers' 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 Big Rivers' laboratory personnel or is provided by the Supplier pursuant to the contract agreement.

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|     | A STATEMENT | - Sha                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| ELECTRIC CORPORATION       | 1           |                       | Policy N     | umber: <u>120</u>    |                     |
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|                            | Fuel Procur | ement Policies and    | d Procedures |                      |                     |
| Original Effective<br>Date | 07/16/2009  | Date Last<br>Reviewed | ,09/16/2016  | Approved by<br>BOARD | Deleted: 08/21/2015 |
| Original Approval<br>Date  | 12/20/2007  | Date Last Revised     | ,09/16/2016  |                      | Deleted: 08/21/2015 |

- 4. <u>Amendments.</u> A contract shall not be materially amended except after analysis by the Department and recommendation of the Director or the VP Production. No material contract or purchase order addendum shall be made except upon legal review of such amendment, recommendation of the Director and the approval of the VP Production pursuant to the limits of the Energy Related Transaction Authority, Policy (Board Policy 105). Amendments to contracts that were originally approved by the Board shall also be approved by the Board.
- 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 Big Rivers. If any request is not approved in whole or in part, the Director shall advise the supplier, specifying Big Rivers' objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Big Rivers as dictated by contract terms shall be the primary method of resolving the issue.
- <u>Force Majeure</u>. 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 <u>Big</u> Rivers' legal counsel.
- 7. <u>Inspections.</u> 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:

- General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by Big Rivers in a reasonable, fair, and practical manner to achieve supplier compliance with Big Rivers' overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
- 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 VP Production 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 Big Rivers 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,

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| ELECTRIC CORPORATION      | N           |                    | Policy     | Number: <u>120</u> |                     |
|---------------------------|-------------|--------------------|------------|--------------------|---------------------|
|                           | Fuel Procur | ement Policies and | Procedures |                    |                     |
| <b>Driginal Effective</b> |             | Date Last          |            | Approved by        |                     |
| Date                      | 07/16/2009  | Reviewed           | 09/16/2016 | BOARD              | Deleted: 08/21/2015 |
| Driginal Approval         |             |                    |            |                    |                     |
| Date                      | 12/20/2007  | Date Last Revised  | 09/16/2016 | _                  | Deleted: 08/21/2015 |

#### G. Inventory Levels:

Big Rivers has an obligation to ensure continuous low cost, reliable service to its Member-Owners. Decisions affecting fuel inventory shall consider these obligations.

Big Rivers 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 Senior Management and shall be in accordance with or modify concurrently Solid Fuel Inventory Policy (Board Policy 121).

Solid fuel inventories and reagent shall be monitored and reported regularly via.Big Rivers' fuel information system(s).

#### H. **Emergency Procurement:**

Any one or more of the procedures described herein may be waived by the VP Production, 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 Big Rivers 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 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 Deleted: the Company

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Page 8 of 10

| Rivers                |             |                    | DUAR       |                    |                     |
|-----------------------|-------------|--------------------|------------|--------------------|---------------------|
| J ELECTRIC CORPORATIO | N           |                    | Policy     | Number: <u>120</u> |                     |
|                       | Fuel Procur | ement Policies and | Procedures |                    |                     |
| Original Effective    |             | Date Last          |            | Approved by        |                     |
| Date                  | 07/16/2009  | Reviewed           | 09/16/2016 | BOARD              | Deleted: 08/21/2015 |
| Original Approval     |             |                    |            |                    |                     |
| Date                  | 12/20/2007  | Date Last Revised  | 09/16/2016 |                    | Deleted: 08/21/2015 |

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 Big Rivers.

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#### Ethics and Conduct:

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Big Rivers recognizes the importance of following appropriate business ethics to guide the conduct of the Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of Big Rivers including, but not limited to, the Board of Directors Ethics Policy (Board Policy 102) and the Conflicts of Interest Policy (Board Policy 108) 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 Big Rivers, its Member-Owners, and stakeholders in the performance of their duties and responsibilities.

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Page 9 of 10

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| D   | D.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| KIO | KIVPrs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
| 10  | ELECTRIC CORPORATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |

|                       | Fuel Procurement Policies and Procedures |                                              |                                                                                 |                                |                      | 7 |                     |  |
|-----------------------|------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------|--------------------------------|----------------------|---|---------------------|--|
| Original Effe<br>Date | ective                                   | 07/16/2009                                   | Date Last<br>Reviewed                                                           | ,09/16/2016                    | Approved by<br>BOARD |   | Deleted: 08/21/2015 |  |
| Original App<br>Date  | oroval                                   | 12/20/2007                                   | Date Last Revised                                                               | ,09/16/2016                    |                      |   | Deleted: 08/21/2015 |  |
| Original              | 12/21/2                                  | 007 Appro                                    | ved to be effective at clo                                                      | se of unwind                   | Board                |   |                     |  |
| Rev 1                 | 03/16/2                                  |                                              | e out of date language an                                                       |                                | Board                |   |                     |  |
| Rev 2                 | 03/14/2                                  |                                              | e due to title change                                                           |                                |                      |   |                     |  |
| Rev 3                 | 03/21/2                                  |                                              | ate last reviewed line, se<br>e "mmBTU" to "gallon"                             |                                | Board                |   |                     |  |
| Rev 4                 | 09/19/2                                  | 014 Chang                                    | e e                                                                             |                                | Board                |   |                     |  |
| Rev 5                 | 08/21/2                                  | Relate                                       | ference to Board Policy<br>d Transaction Authority<br>Solid Fuel Inventory; gen | and Board Policy               | Board                | 4 | Formatted Table     |  |
| Rev 6                 | 09/16/20                                 | 121 - Solid Fuel Inventory; general clean up |                                                                                 | ivers Electric<br>ified policy | Board                |   |                     |  |

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 33)   |                                                                  |
|----|------------|------------------------------------------------------------------|
| 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 May 1, 2016, to      |
| 5  |            | October 31, 2016.                                                |
| 6  |            | b. If the response is 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 May 1, 2016, through October 31, 2016. Big Rivers is also |
| 16 |            | unaware of any unreported violation prior to the current period  |
| 17 |            | under review.                                                    |
| 18 |            | b.                                                               |
| 19 |            | (1) - (3)                                                        |
| 20 |            | Not Applicable.                                                  |
| 21 |            |                                                                  |
| 22 |            |                                                                  |
| 23 | Witnesses) | Mark W. McAdams (Coal) and                                       |
| 24 |            | Wayne O'Bryan (Natural Gas)                                      |

Case No. 2017-00006 Response to Staff Item 33 Witnesses: Mark W. McAdams (*Coal*) and Wayne O'Bryan (*Natural Gas*) Page 1 of 1

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 Item 34) 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 May 1, 2016, to October 31, 2016. 5

Response) There were no changes in the organizational structure and/or
personnel of the departments or divisions that are responsible for Big Rivers fuel
procurement activities occurring between the period May 1, 2016, to October 31,
2016.

- 10
- 11

12 Witnesses) Mark W. McAdams (Coal) and

13 Wayne O'Bryan (Natural Gas)

14

Case No. 2017-00006 Response to PSC 1-34 Witnesses: Mark W. McAdams (*Coal*) and Wayne O'Bryan (*Natural Gas*) Page 1 of 1

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| •   |           |                                                                    |
|-----|-----------|--------------------------------------------------------------------|
| 2   |           | a. Identify all changes that Big Rivers made during the period     |
| 3   |           | from May 1, 2016, to October 31, 2016, to its maintenance          |
| 4   |           | and operation practices that 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 H | Response) |                                                                    |
| 10  |           | a. During the period from May 1, 2016, to October 31, 2016, Big    |
| 11  |           | Rivers made no changes to its maintenance and operation            |
| 12  |           | practices which affected its fuel usage. Big Rivers did extend the |
| 13  |           | 23-day planned outage on Station II Unit 1 to 52 days due to the   |
| 14  |           | increase work scope of replacing the primary air heater baskets    |
| 15  |           | that were scheduled to be changed in the spring of 2017. For       |
| 16  |           | more information on the replacement of the air heat baskets,       |
| 17  |           | please see Big Rivers' response to Item 39 of these information    |
| 18  |           | requests.                                                          |
| 19  |           | b. Big Rivers estimates that Station II Unit 1 burned 33,664 less  |
| 20  |           | tons of coal during the period from May 1, 2016, to October 31,    |
| 21  |           | 2016, as a results of the extended outage.                         |
| 22  |           |                                                                    |
| 23  |           |                                                                    |
| 24  |           |                                                                    |

Case No. 2017-00006 Response to PSC 1-35 Witnesses: Jason C. Burden (a. only) and Mark W. McAdams (b. only) Page 1 of 2

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

## February 20, 2017

| 1 |            |                               |
|---|------------|-------------------------------|
| 2 | Witnesses) | Jason C. Burden (a. only) and |
| 3 |            | Mark W. McAdams (b. only)     |
| 4 |            |                               |

Case No. 2017-00006 Response to PSC 1-35 Witnesses: Jason C. Burden (a. only) and Mark W. McAdams (b. only) Page 2 of 2

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1  | Item 36)   |                                                                |
|----|------------|----------------------------------------------------------------|
| 2. |            | a. List all intersystem sales during the period from May 1,    |
| 3  |            | 2016, to October 31, 2016, in which Big Rivers used a third    |
| 4  |            | party's transmission system.                                   |
| 5  |            | b. For each sale listed above:                                 |
| 6  |            | (1)Describe the effect on the FAC calculation of line losses   |
| 7  |            | related to intersystem sales when using a third party's        |
| 8  |            | transmission system;                                           |
| 9  |            | (2) State the line-loss factor used for each transaction and   |
| 10 |            | describe how such line-loss factor was determined.             |
| 11 |            |                                                                |
| 12 | Response)  |                                                                |
| 13 |            | a. Big Rivers had no intersystem sales during the period under |
| 14 |            | review in which it used a third party's transmission system.   |
| 15 |            | b.                                                             |
| 16 |            | (1) Not Applicable.                                            |
| 17 |            | (2) Not Applicable.                                            |
| 18 |            |                                                                |
| 19 |            |                                                                |
| 20 | Witnesses) | Wayne O'Bryan (a. and b.(2) only) and                          |
| 21 |            | Nicholas R. Castlen $(b.(1) only)$                             |
| 22 |            |                                                                |

Case No. 2017-00006 Response to PSC 1-36 Witnesses: Wayne O'Bryan (a. and b.(2) only) and Nicholas R. Castlen (b.(1) only) Page 1 of 1

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| <ul> <li>a. Describe the effect on the FAC calculation of line log related to intersystem sales when not using a third part transmission system.</li> <li>b. Describe each change that Big Rivers made to methodology for calculating intersystem sales line log during the period from May 1, 2016, to October 31, 2016.</li> <li>Response)</li> <li>a. Line losses related to intersystem sales are included in Big Rivers filing. Big Rivers calculates an overall system average fuel per kWh each month by dividing (1) the total cost of fuel generation by (2) the net kWh generated minus total System Losses. The overall system average fuel cost per kWh (w) accounts for Total System Losses, including line losses relate to methodology is multiplied by the intersystem sales volumeters.</li> </ul>                                    | l to intersystem sales when not using a third party's<br>vission system. |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| <ul> <li>related to intersystem sales when not using a third part<br/>transmission system.</li> <li>b. Describe each change that Big Rivers made to<br/>methodology for calculating intersystem sales line lo<br/>during the period from May 1, 2016, to October 31, 2016.</li> <li>Response)</li> <li>a. Line losses related to intersystem sales are included in Big Riv<br/>Total System Losses reported on page 3 of its monthly Form<br/>filing. Big Rivers calculates an overall system average fuel<br/>per kWh each month by dividing (1) the total cost of fuel<br/>generation by (2) the net kWh generated minus total System<br/>Losses. The overall system average fuel cost per kWh (wh<br/>accounts for Total System Losses, including line losses related<br/>intersystem sales) is multiplied by the intersystem sales volu</li> </ul> | l to intersystem sales when not using a third party's<br>vission system. |
| 4transmission system.5b. Describe each change that Big Rivers made to6methodology for calculating intersystem sales line lo7during the period from May 1, 2016, to October 31, 2016.899Response)10a. Line losses related to intersystem sales are included in Big Riv11Total System Losses reported on page 3 of its monthly Form12filing. Big Rivers calculates an overall system average fuel13per kWh each month by dividing (1) the total cost of fuel14generation by (2) the net kWh generated minus total System15Losses. The overall system average fuel cost per kWh (w)16accounts for Total System Losses, including line losses related17intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                      | vission system.                                                          |
| 6methodology for calculating intersystem sales line lo7during the period from May 1, 2016, to October 31, 2016.899Response)10a. Line losses related to intersystem sales are included in Big Riv<br>Total System Losses reported on page 3 of its monthly Form<br>filing. Big Rivers calculates an overall system average fuel<br>per kWh each month by dividing (1) the total cost of fuel<br>generation by (2) the net kWh generated minus total Syst<br>IS15Losses. The overall system average fuel cost per kWh (will<br>accounts for Total System Losses, including line losses related<br>intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                         | be each change that Big Rivers made to its                               |
| 6methodology for calculating intersystem sales line lo<br>during the period from May 1, 2016, to October 31, 2016.8910a. Line losses related to intersystem sales are included in Big Riv<br>Total System Losses reported on page 3 of its monthly Form<br>filing. Big Rivers calculates an overall system average fuel<br>per kWh each month by dividing (1) the total cost of fuel<br>generation by (2) the net kWh generated minus total Syst<br>IS15161717                                                                                                                                                                                                                                                                                                                                                                                         |                                                                          |
| 7during the period from May 1, 2016, to October 31, 2016.8910a. Line losses related to intersystem sales are included in Big Riv<br>Total System Losses reported on page 3 of its monthly Form<br>filing. Big Rivers calculates an overall system average fuel<br>per kWh each month by dividing (1) the total cost of fuel<br>generation by (2) the net kWh generated minus total Syst<br>Losses. The overall system average fuel cost per kWh (w)<br>accounts for Total System Losses, including line losses relate<br>intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                |                                                                          |
| <ul> <li><b>Response)</b></li> <li>a. Line losses related to intersystem sales are included in Big Rivers 11</li> <li>Total System Losses reported on page 3 of its monthly Formation 12</li> <li>Big Rivers calculates an overall system average fuel 13</li> <li>per kWh each month by dividing (1) the total cost of fuel 14</li> <li>generation by (2) the net kWh generated minus total System 15</li> <li>Losses. The overall system average fuel cost per kWh (will accounts for Total System Losses, including line losses related 17</li> </ul>                                                                                                                                                                                                                                                                                               |                                                                          |
| 10a. Line losses related to intersystem sales are included in Big Riv11Total System Losses reported on page 3 of its monthly Form12filing. Big Rivers calculates an overall system average fuel13per kWh each month by dividing (1) the total cost of fuel14generation by (2) the net kWh generated minus total System15Losses. The overall system average fuel cost per kWh (what16accounts for Total System Losses, including line losses relate17intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                     |                                                                          |
| 11Total System Losses reported on page 3 of its monthly Form12filing. Big Rivers calculates an overall system average fuel13per kWh each month by dividing (1) the total cost of fuel14generation by (2) the net kWh generated minus total System15Losses. The overall system average fuel cost per kWh (where the system cost of the system accounts for Total System Losses, including line losses related17intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                                                           |                                                                          |
| filing. Big Rivers calculates an overall system average fuel<br>per kWh each month by dividing (1) the total cost of fuel<br>generation by (2) the net kWh generated minus total Sys<br>Losses. The overall system average fuel cost per kWh (w)<br>accounts for Total System Losses, including line losses relate<br>intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | ses related to intersystem sales are included in Big Rivers'             |
| 13per kWh each month by dividing (1) the total cost of fuel14generation by (2) the net kWh generated minus total Sys15Losses. The overall system average fuel cost per kWh (w)16accounts for Total System Losses, including line losses relate17intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | ystem Losses reported on page 3 of its monthly Form A                    |
| 14generation by (2) the net kWh generated minus total Sys15Losses. The overall system average fuel cost per kWh (w)16accounts for Total System Losses, including line losses relate17intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Big Rivers calculates an overall system average fuel cost                |
| 15Losses. The overall system average fuel cost per kWh (w)16accounts for Total System Losses, including line losses relate17intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | h each month by dividing (1) the total cost of fuel for                  |
| 16accounts for Total System Losses, including line losses relate17intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | ion by (2) the net kWh generated minus total System                      |
| 17 intersystem sales) is multiplied by the intersystem sales volu                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The overall system average fuel cost per kWh (which                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | s for Total System Losses, including line losses related to              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | tem sales) is multiplied by the intersystem sales volume                 |
| 18 to calculate the cost of fuel allocated to intersystem sales in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | late the cost of fuel allocated to intersystem sales in Big              |
| 19Rivers' monthly Form A filing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | nonthly Form A filing                                                    |
| 20 b. Big Rivers has not made any changes to its methodology                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | ers has not made any changes to its methodology for                      |
| 21 calculating intersystem line losses during the period from Ma                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | ing intersystem line losses during the period from May 1,                |
| 22 2016, to October 31, 2016.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | October 31, 2016.                                                        |
| 23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                          |
| 24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                          |

Case No. 2017-00006 Response to PSC 1-37 Witnesses: Nicholas R. Castlen (a. only) and Wayne O'Bryan (b. only) Page 1 of 2

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

### February 20, 2017

| 1 |            |                                   |
|---|------------|-----------------------------------|
| 2 | Witnesses) | Nicholas R. Castlen (a. only) and |
| 3 |            | Wayne O'Bryan (b. only)           |
| 4 |            |                                   |

Case No. 2017-00006 Response to PSC 1-37 Witnesses: Nicholas R. Castlen (a. only) and Wayne O'Bryan (b. only) Page 2 of 2

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

1 Item 38) State whether Big Rivers has solicited bids for coal with the 2 restriction that it was not mined through strip mining or mountain top 3 removal. If the response is yes, explain the reasons for the restriction on 4 the solicitation, the quantity in tons and price per ton of the coal 5 purchased as a result of this solicitation, and the difference between the 6 price of this coal and the price it could have obtained for the coal if the 7 solicitation had not been restricted.

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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.

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13 Witness) Mark W. McAdams

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Case No. 2017-00006 Response to PSC 1-38 Witness: Mark W. McAdams Page 1 of 1

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

Item 39) Provide a detailed discussion of any specific generation
 efficiency improvements Big Rivers has undertaken during the period
 from May 1, 2016 to October 31, 2016

4

**Response)** During the planned outage on Station II – Unit # 1 which began April 5 29, 2016, the primary air heater baskets (which were originally identified to be 6 replaced in the spring 2017 outage) were found to be in worse than anticipated 7 condition. Inasmuch as the air heater baskets were on-site in preparation for the 8 2017 spring outage, Big Rivers chose to replace the primary air heater baskets 9 during this earlier planned outage. The decision to change out the air heater 10 baskets changed the outage duration from 23 days to 52 days with the increased 11 work scope. Pre-outage, 'A' primary air heater air side efficiency had dropped 12 from 60% to 36%, indicating that the exit gas temperature was not transferring 13 heat to the air side. Going into the outage, it was thought that most of the 14 efficiency could be regained by wedging the baskets so that air could be evenly 15 balanced across the baskets again since 'B' primary air heater air side wasn't 16 17 showing the same efficiency loss. The initial inspection showed that the baskets on both 'A' and 'B' side had surpassed their useful life, requiring replacement. Big 18 Rivers replaced both "Hot-end" and "Cold-end" baskets on 'A' and 'B' primary air 19 heaters that were originally scheduled for replacement in 2017. Post outage, the 20 gas side and air side efficiency returned to their design parameters on both 21 22 primary air heaters.

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24 Witness) Jason C. Burden

Case No. 2017-00006 Response to PSC 1-39 Witness: Jason C. Burden Page 1 of 1

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| 1 | Item 40) State whether all contracts related to commodity and/or             |  |  |
|---|------------------------------------------------------------------------------|--|--|
| 2 | transportation have been filed with the Commission. If any contracts have    |  |  |
| 3 | not been filed, explain why they have not been filed and provide a copy.     |  |  |
| 4 |                                                                              |  |  |
| 5 | Response) All contracts related to commodity and/or transportation have been |  |  |
| 6 | filed with the Commission.                                                   |  |  |
| 7 |                                                                              |  |  |
| 8 |                                                                              |  |  |
|   |                                                                              |  |  |

- 9 Witness: Mark W. McAdams
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Case No. 2017-00006 Response to PSC 1-40 Witness: Mark W. McAdams Page 1 of 1

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

Identify any issues that could affect fuel costs for the two-year 1 **Item 41)** period that remain unresolved or unsettled. Include in the response any 2 issues related to billings from a regional transmission operator. Consider 3 this a continuing request to inform the Commission if Big Rivers becomes 4 aware of any issues during the course of this proceeding. 5 6 Response) An issue that could have an impact and/or affect fuel costs for the 7 two-year period that remains unresolved/unsettled are associated costs for Excess 8 9 Henderson Energy for Station II as discussed in Case No. 2016-00278.10 10 11 12 Witness) Mark W. McAdams 13

Case No. 2017-00006 Response to PSC 1-41 Witness: Mark W. McAdams Page 1 of 1

<sup>&</sup>lt;sup>10</sup> See In the Matter of: Application of Big Rivers Electric Corporation for a Declaratory Order, Case No. 2016-00278.

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

Item 42) Explain in detail how Big Rivers classifies a generation
 outage as forced or scheduled.

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**Response**) Big Rivers classifies a generation outage as "forced" when the unit is immediately unavailable due to an unanticipated event in which the repair could not have been planned or delayed. Big Rivers classifies a generation outage as "scheduled" when the problem has been identified, an action plan has been established to facilitate the repairs, and an estimated duration for returning the unit to service has been determined prior to the generator being removed from service. These classifications are consistent with the standards of the IEEE.

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13 Witness) Jason C. Burden

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Case No. 2017-00006 Response to PSC 1-42 Witness: Jason C. Burden Page 1 of 1

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# **Response to Commission Staff's Request for Information** dated February 6, 2017

February 20, 2017

Refer to Big Rivers' Form A and Form B filings for the October 1 Item 43) 2016 expense month. A number of adjustments were made for the months 2 of June-September 2016. 3 Provide a narrative explanation of the adjustments, the reason(s) for the adjustments, and the effect the 4 5 adjustments had on the FAC.

6

Response) The prior period adjustments included in Big Rivers' Form A and 7 Form B filings for the October 2016 expense month related to the following four 8 9 items:

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11 1. Beginning in June 2016, Big Rivers stopped taking portions of Henderson Municipal Power & Light's ("HMP&L") monthly Excess 12 Henderson Energy from Station II when such energy was determined to 13 be uneconomic ("HMP&L's Uneconomic Excess Henderson Energy"). 14 However, the reports used to prepare Big Rivers' monthly Form A filings 15 for the expense months of June 2016 through August 2016 inadvertently 16 included HMP&L's Uneconomic Excess Henderson Energy volumes 17 (provided in the table below) in the reported inter-system sales volumes.

18 19

| Month  | HMP&L's<br>Uneconomic Excess Energy Volumes<br>(kWhs) |
|--------|-------------------------------------------------------|
| Jun-16 | 18,140,000                                            |
| Jul-16 | 23,989,000                                            |
| Aug-16 | 21,285,000                                            |

Case No. 2017-00006 **Response to PSC 1-43** Witness: Nicholas R. Castlen Page 1 of 5

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# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

As a result, the "Inter-system Sales including interchange-out" volumes (reported on Page 3 of Big Rivers' Form A filings for the expense months of June 2016 through August 2016) were overstated, and Big Rivers' "System Losses" were understated by the amounts of HMP&L's Uneconomic Excess Henderson Energy volumes during those months. This ultimately caused the fuel costs allocated to inter-system sales in Big Rivers' original Form A filings for the June, July, and August 2016 expense months to be overstated, and the cost of fuel allocated to Big Rivers' Members to be understated, by approximately \$197,100, \$234,800, and \$208,600, respectively.

Adjustments to correct these errors were included in Appendix A to Big Rivers' Form A filing for the October 2016 expense month. The net effects of these adjustments on Big Rivers' total recoverable fuel cost ("F(m)") by expense month are provided in the table below.

| <b>Expense Month</b> | Effect on Total F(m) |
|----------------------|----------------------|
| Jun-16               | \$197,100            |
| Jul-16               | \$234,800            |
| Aug-16               | \$208,600            |
| Total                | \$640,500            |

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2. Green Unit 2's net generation originally reported for August 2016, and included in the "Generation (Net)" kWh amount reported on Page 3 of Big Rivers' original Form A filing for the August 2016 expense month, was overstated by 206,092 kWh. The overstated net generation for Green Unit 2 caused Green Unit 2's average fuel cost per kWh to be

Case No. 2017-00006 Response to PSC 1-43 Witness: Nicholas R. Castlen Page 2 of 5

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

### Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

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24 25 slightly understated, which ultimately impacted the forced outage calculations, causing the "Fuel (Substitute Cost for Forced Outage)" (included on Page 2 of Big Rivers' original Form A filing for the August 2016 expense month) to be understated by approximately \$300.

An adjustment to correct this error was included in Appendix A to Big Rivers' Form A filing for the October 2016 expense month. The net effect of this adjustment was a reduction of approximately \$300 to Big Rivers' total F(m) for the August 2016 expense month.

- 3. HMP&L's Uneconomic Excess Henderson Energy not taken by Big Rivers during September 2016 (26,510,000 kWh) was properly excluded from the "Inter-system Sales including interchange-out" volumes reported on Page 3 of Big Rivers' original Form A filing for the September 2016 expense month but was inadvertently included in the inter-system sales volumes used to calculate the cost of fuel allocated to inter-system sales on Page 2. As a result, the fuel costs allocated to inter-system sales in Big Rivers' original Form A filing for the September 2016 expense month was overstated, and Big Rivers' total F(m) was understated, by approximately \$669,200.
- 19An adjustment to correct this error was included in Appendix A to20Big Rivers' Form A filing for the October 2016 expense month. The net21effect of this adjustment was an increase of approximately \$669,200 to22Big Rivers' total F(m) for the September 2016 expense month.
  - The "Pet Coke Burned" amount reported on page 2 of Big Rivers' original Form A filing for the September 2016 expense month was overstated by \$693,932. An accounting adjustment was made in September 2016 to

Case No. 2017-00006 Response to PSC 1-43 Witness: Nicholas R. Castlen Page 3 of 5

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

debit (*i.e.*, increase) Green's pet coke inventory balance for \$693,932 and credit (*i.e.*, decrease) fuel expense by \$693,932 for Green's pet coke burned. However, the accounting adjustment was inadvertently excluded from the monthly fuel burned report used to prepare Big Rivers' Form A filing for the September 2016 expense month, which caused the "Pet Coke Burned" amount to be overstated by \$693,932 (i.e. the amount of the adjustment not included in the fuel burned report used to prepare the filing).

An adjustment to correct this error was included in Appendix A to Big Rivers' Form A filing for the October 2016 expense month. The adjustment reduced the total fuel costs allocated to inter-system sales in Big Rivers' September 2016 Form A filing by \$419,000 and reduced the total fuel costs allocated to Big Rivers' Members by approximately \$274,900. Accordingly, the net effect on Big Rivers' FAC was a decrease of approximately \$274,900 to Big Rivers' total F(m) for the September 2016 expense month.

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18 The net effects of these four adjustments, included in Appendix A to 19 Big Rivers' Form A filing for the October 2016 expense month, are summarized in 20 the table on the following page.

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Case No. 2017-00006 Response to PSC 1-43 Witness: Nicholas R. Castlen Page 4 of 5

# AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

# Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

| Net Effects of Adjustments Included in Appendix A to Big<br>Rivers' October 2016 Form A Filing on Big Rivers' Total<br>Recoverable Fuel Cost (F(m)) by Expense Month<br>\$ 000's |        |       |        |       |        |       |        |         |       |         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------|--------|-------|--------|-------|--------|---------|-------|---------|
| Item No.                                                                                                                                                                         | Jun-16 |       | Jul-16 |       | Aug-16 |       | Sep-16 |         | Total |         |
| 1.                                                                                                                                                                               | \$     | 197.1 | \$     | 234.8 | \$     | 208.6 | \$     |         | \$    | 640.5   |
| 2.                                                                                                                                                                               |        | -     |        | -     |        | (0.3) |        | -       | _     | (0.3)   |
| 3.                                                                                                                                                                               |        | -     |        | -     |        | -     |        | 669.2   |       | 669.2   |
| 4.                                                                                                                                                                               |        | -     |        | -     |        | -     |        | (274.9) |       | (274.9) |
| Total                                                                                                                                                                            | \$     | 197.1 | \$     | 234.8 | \$     | 208.3 | \$     | 394.3   | \$ :  | 1,034.5 |

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Witness) Nicholas R. Castlen

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Case No. 2017-00006 Response to PSC 1-43 Witness: Nicholas R. Castlen Page 5 of 5

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

Response to Commission Staff's Request for Information dated February 6, 2017

February 20, 2017

1 **Item 44)** Refer to Big Rivers Form B filings for the September and 2 October 2016 expense months, page 1 of 21, Footnote 1. 3 a. Provide the journal entries made by Big Rivers related to 4 5 each of these footnotes. 6 b. Explain in detail what is meant by, "The shortfall for 7 September was offset against the revenue for September to 8 the City of Henderson for the Excess Energy not taken by

- Big Rivers" as well as the same quote for October. Include in the response any dollar amounts related to these statements.
- 13 **Response**)

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 a. Please see redacted versions of Attachments 1 and 2 for the September and October 2016 journal entries, respectively, related to Footnote 1, on page 1 of 21, of the Form B filings for those months. CONFIDENTIAL versions of these attachments are being filed with a Petition for Confidential Treatment.

b. Please see redacted Attachments 3 and 4 for the invoices from Henderson Municipal Power & Light (HMP&L) to Big Rivers for the Excess Henderson Energy for September and October 2016, respectively. The monthly Excess Henderson Energy invoices are prepared by Big Rivers on HMP&L's behalf. CONFIDENTIAL versions of these attachments are being filed with a Petition for Confidential Treatment.

> Case No. 2017-00006 Response to PSC 1-44 Witness: Nicholas R. Castlen Page 1 of 2

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016 CASE NO. 2017-00006

### Response to Commission Staff's Request for Information dated February 6, 2017

#### February 20, 2017

1 For September 2016, HMP&L received revenues of for its Excess Henderson Energy, which consisted of 2 from Big Rivers for the Excess Henderson Energy 3 4 purchased by Big Rivers and for the revenues earned on the Excess Henderson Energy sold into the Midcontinent 5 Independent System Operator (MISO) wholesale power market. 6 7 HMP&L's September 2016 revenues of from the Excess Henderson Energy were offset by charges from Big Rivers 8 9 for the costs associated with Big Rivers' coal and 10 lime inventory which Big Rivers supplied for HMP&L's Excess Henderson Energy sold into MISO. 11 12 October 2016, HMP&L received revenues For of for its Excess Henderson Energy, which consisted of 13 from Big Rivers for the Excess Henderson Energy 14 purchased by Big Rivers and 15 for the revenues earned on HMP&L's Excess Henderson Energy sold into the MISO 16 17 wholesale power market. HMP&L's October 2016 revenues of 18 were partially offset by a charge from Big Rivers for the costs associated with Big Rivers' coal, which Big 19 20 Rivers supplied for HMP&L's Excess Henderson Energy sold into 21 MISO 22 23 24 Witness: Nicholas R. Castlen

> Case No. 2017-00006 Response to PSC 1-44 Witness: Nicholas R. Castlen Page 2 of 2

#### **Big Rivers Electric Corp** FINAL JOURNAL REPORT Party Name: Big Rivers Report Format: Final September 2016

|            | Resp        | Responsibility        |                        |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------|-------------|-----------------------|------------------------|----------------------|------------|------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | Center      | From                  | Project                | <b>Resource</b> Type | Process    | Code Value             | Debit                           | Credit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|            | 0999        | 10                    | BRACCRUAL              | COAL-EE              | 0699       | 14350054               |                                 | N.C.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|            | 0999        | 10                    | BRFUELINV              | COALINV-GN           | 0699       | 15113000               | \$4,441,011.47                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | 0999        | 10                    | BRFUELINV              | COAL-TR-GN           | 0699       | 15113100               | \$326,806.56                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | 0999        | 10                    | BRFUELINV              | COAL-TR-GN           | 0699       | 15113100               |                                 | \$55,079.85                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|            | 0999        | 10                    | BRFUELINV              | COALINV-WL           | 0699       | 15114000               | \$5,156,569.35                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | 0999        | 10                    | BRFUELINV              | COAL-TR-WL           | 0699       | 15114100               | \$441,852.05                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | 0999        | 10                    | BRFUELINV              | COAL-TR-WL           | 0699       | 15114100               |                                 | \$1,401,227.61                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|            | 0999        | 10                    | BRFUELINV              | COALINV-ST           | 0699       | 15115000               | \$3,659,824.34                  | h                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|            | 0999        | 10                    | BRFUELINV              | COALINV-ST           | 0699       | 15115000               |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | 0999        | 10                    | BRACCRUAL              | COAL-G               | 0699       | 23201500               |                                 | \$4,712,738.18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|            | 0999        | 10                    | BRACCRUAL              | COAL-SII             | 0699       | 23201500               |                                 | \$3,659,824.34                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|            | 0999        | 10                    | BRACCRUAL              | COAL-W               | 0699       | 23201500               | \$371,547.04                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | 0999        | 10                    | BRACCRUAL              | COAL-W               | 0699       | 23201500               |                                 | \$4,568,740.83                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|            |             | Inumat                | Entry Type: J03        | 0.052-0916           | P.T 773    | 577                    |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            |             |                       |                        |                      | 14 1 13    |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            |             |                       | Entry Description: Con |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            |             | Journal               | Mask: J03              | 0                    |            | Totals:                |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            |             | Gold State Street and |                        |                      |            |                        | Contraction of the second state | Contraction of the local division of the loc |
|            |             |                       |                        |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | Period To A | pply Year: 2016       | Month: Septemb         | per                  |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            |             | David                 |                        |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | Entry By    | Juna                  | J. ashby               |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | Review By   | Third                 | S. ashby               |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            |             | Nul                   | 0 1 10                 |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            | Approval By | dow                   | 10/12/16               |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|            |             |                       | •                      |                      |            |                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| JI LIOII ( | of Sep-20   | no entry ab           | ove related to I       | Big Rivers' coa      | al used f  | or HMP&L's Excess Hend | lerson Energy n                 | ot taken by Big                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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#### Big Rivers Electric Corp FINAL JOURNAL REPORT Party Name: Big Rivers Report Format: Final September 2016

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| Center | From | Project | Resource Type | Process | Code Value     | Debit | Credit |
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|        |      |         |               |         | Report Totals: |       |        |

| Station II Coal Inventory     |                  |                        |                              |                       | · · · · · · · · · · · · · · · · · · · |                |                 |            |           |               |          |
|-------------------------------|------------------|------------------------|------------------------------|-----------------------|---------------------------------------|----------------|-----------------|------------|-----------|---------------|----------|
|                               |                  | •                      |                              |                       | • • • • •                             | •              |                 | ** •       |           |               |          |
|                               | Month            | Tons                   | <b>Dollars</b>               | \$/Ton                | MMBTU's                               | 1.44           |                 | •          | • ·       |               | ·        |
| Ending Inventory              | Aug-16           | 336,862.34             | 20,411,312.60                | \$60.5924             |                                       | <u>S/mmbtu</u> | <u>Moisture</u> | <u>Ash</u> | BTU       | <u>Sulfur</u> | Heat-ELA |
| Physical Inventory            | Sep-16           |                        |                              |                       | 8,223,133.3100                        | \$2.482182     | 7.71            | 9.68       | 12,245    | 3.43          |          |
| Purchases<br>itation Transfer | Sep-16<br>Sep-16 | 60,425.59              | 3,659,824.34                 | \$60.5675<br>\$0.0000 | 1,476,238.48                          | \$2.479155     | 8.30            | 9.07       | 12,215    | 3.29          | 24.43    |
| iubtotal                      | Sep-16           | 397,287.93             | 24,071,136.94                | \$60.5886             | 9,699,371.79                          | 40.00          |                 |            |           |               |          |
|                               | ·····            | 0.00                   | ··· ·                        | \$0.0000              | 5,055,571.79                          | \$2.481721     | 7.80            | 9.59       | 12,240    | 3.41          |          |
| Jsage-H 1<br>Jsage-H 2        | Sep-16<br>Sep-16 | 19,831.99<br>21,865.06 | 1,201,593.38<br>1,324,774.34 | \$60.5886             | 486,677.04                            | \$2.468975     | 8.84            | 7.96       | 12,270    | 3.17          | 24.540   |
| Jsage by HMP&L(City)          | Sep-16           |                        |                              |                       | 535,212.94                            | \$2.475229     | 8.86            | 8.18       | 12,239    | 3.27          | 24.4780  |
|                               |                  |                        | \$0.00                       |                       |                                       |                |                 |            |           |               |          |
| nding inventory               | Sep-16           | 348,160.79             | 21,094,590.14                | 660 F005              |                                       | -              | 4               |            |           |               |          |
| hysical Inventory             | Oct-16           |                        | 5                            | \$60.5886             | 8,495,388.96                          | \$2.483063     | 7.85            | 9.97       | 12,500    | 3.51          | • •      |
| urchases<br>tation Transfer   | Oct-16<br>Oct-16 | 43,185.56              | 2,551,776.09                 | \$59.0886<br>\$0.0000 | 1,054,663.25                          | \$2.419517     | 0.00            | 0.00       | 0         | 0.00          | 24.42    |
| ubtotal                       | Oct-16           | 391,346.35<br>0.00     | 23,646,366.23                | \$60.4231<br>\$0.0000 | 9,550,052.21                          | \$2.476046     | 6.98            | 8.87       | 11,121    | 3.12          |          |
| isage-H 1<br>Isage-H 2        | Oct-16<br>Oct-16 | 10,593.83<br>9,668.16  | 640,112.23<br>584,180.36     | \$60.4231             | 262,472.73                            | \$2.438776     | 8.82            | 7.36       | 12,388    | 3.09          | 24.776   |
| sage by HMP&L(City)           | Oct-16           |                        |                              | \$60.4231             | 240,621.17                            | \$2.427801     | 8.29            | 7.41       | 12,444    | 3.05          | 24.8880  |
| nding Inventory               | Oct-16           | 361,506.82             | \$0.00 ±<br>21,843,368.98    |                       |                                       | ;i             |                 | 5          |           |               | 27.000   |
|                               |                  |                        | 21,043,308.98                | \$60.4231             | 8,813,730.52                          | \$2.478334     | 7.08            | 0.10       | alam atta | 3.21          |          |

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Case No. 2017-00006 Attachment 1 for Response to PSC 1-44 Witness: Nicholas R. Castlen Page 3 of 3

#### Big Rivers Electric Corp FINAL JOURNAL REPORT Party Name: Big Rivers Report Format: Final October 2016

| From    | Project                                                                  |                                                                                                                                                                                                                                                                               | Dates                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | C 1 11 1                                                                                                                                                                    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|         | 10<br>10<br>10<br>10<br>10<br>10<br>10<br>10<br>10<br>Journal<br>Journal | 10     BRFUELINV       10     BRFUELINV       10     BRFUELINV       10     BRFUELINV       10     BRFUELINV       10     BRFUELINV       10     BRACCRUAL       10     BRACCRUAL       10     BRACCRUAL       10     BRACCRUAL       10     BRACCRUAL       10     BRACCRUAL | 10     BRFUELINV     COAL-TR-GN       10     BRFUELINV     COALINV-WL       10     BRFUELINV     COAL-TR-WL       10     BRFUELINV     COALINV-ST       10     BRACCRUAL     COAL-G       10     BRACCRUAL     COAL-G       10     BRACCRUAL     COAL-W       10     BRACCRUAL     COAL-W       10     BRACCRUAL     COAL-W | 10       BRFUELINV       COAL-TR-GN       0699         10       BRFUELINV       COALINV-WL       0699         10       BRFUELINV       COAL-TR-WL       0699         10       BRFUELINV       COAL-TR-WL       0699         10       BRFUELINV       COAL-TR-WL       0699         10       BRFUELINV       COAL-TR-WL       0699         10       BRFUELINV       COALINV-ST       0699         10       BRACCRUAL       COAL-G       0699         10       BRACCRUAL       COAL-SII       0699         10       BRACCRUAL       COAL-SII       0699         10       BRACCRUAL       COAL-W       0699         10       BRACRUAL       COAL-W       0699         10       BRACRUAL       COAL-W       0699 | 10         BRFUELINV         COALINV-GN         0699         15113000           10         BRFUELINV         COAL-TR-GN         0699         15113100           10         BRFUELINV         COAL-TR-GN         0699         15113100           10         BRFUELINV         COAL-TR-WL         0699         15114000           10         BRFUELINV         COAL-TR-WL         0699         15114100           10         BRFUELINV         COAL-TR-WL         0699         15114100           10         BRFUELINV         COAL-TR-WL         0699         15114100           10         BRFUELINV         COALINV-ST         0699         15115000           10         BRACCRUAL         COALINV-ST         0699         15115000           10         BRACCRUAL         COAL-G         0699         23201500           10         BRACCRUAL         COAL-SII         0699         23201500           10         BRACCRUAL         COAL-W         0699         23201500           10         BRACCRUAL         COAL-W         0699         23201500           10         BRACCRUAL         COAL-W         0699         23201500           10         BRACCRUAL         COAL-W | 10       BRFUELINV       COALINV-GN       0699       15113000         10       BRFUELINV       COAL-TR-GN       0699       15113100         10       BRFUELINV       COALINV-WL       0699       15113100         10       BRFUELINV       COAL-TR-GN       0699       15114000         10       BRFUELINV       COAL-TR-WL       0699       15114000         10       BRFUELINV       COAL-TR-WL       0699       15114100         10       BRFUELINV       COAL-TR-WL       0699       15115000         10       BRFUELINV       COAL-TR-WL       0699       15115000         10       BRFUELINV       COALINV-ST       0699       15115000         10       BRACCRUAL       COAL-G       0699       23201500         10       BRACCRUAL       COAL-SII       0699       23201500         10       BRACCRUAL       COAL-W       0699       23201500         10       BRACCRUAL       COAL-W | 10       BRFUELINV       COALINV-GN       0699       15113000       \$3,963,084.83         10       BRFUELINV       COAL-TR-GN       0699       15113100       \$6,842,426.52         10       BRFUELINV       COAL-TR-WL       0699       15114000       \$6,842,426.52         10       BRFUELINV       COAL-TR-WL       0699       15114100       \$186,910.74         10       BRFUELINV       COAL-TR-WL       0699       15114100       \$186,910.74         10       BRFUELINV       COAL-TR-WL       0699       15115000       \$2,551.776.09         10       BRFUELINV       COALINV-ST       0699       15115000       \$2,551.776.09         10       BRFUELINV       COALINV-ST       0699       15115000       \$2,551.776.09         10       BRACCRUAL       COAL-SII       0699       23201500       15115000         10       BRACCRUAL       COAL-SII       0699       23201500       100         10       BRACCRUAL       COAL-SII       0699       23201500       100         10       BRACCRUAL       COAL-W       0699       23201500       100         10       BRACCRUAL       COAL-W       0699       23201500       100 |

Period To Apply Year: 2016 Month: October as Entry By Review By Approval By

\* Portion of Oct-2016 entry above related to Big Rivers' coal used for HMP&L's Excess Henderson Energy not taken by Big Rivers:

Dr. Acct. 14350054 - Accounts Receivable-SII Fuel-Excess Energy

Cr. Acct. 15115000 - Fuel Inventory-Coal-SII

#### Big Rivers Electric Corp FINAL JOURNAL REPORT Party Name: Big Rivers Report Format: Final October 2016

| Resp<br>Center | Responsibility<br>From | Project | Resource Type | Process | Code Value     | Debit | Credit |
|----------------|------------------------|---------|---------------|---------|----------------|-------|--------|
|                |                        |         |               |         | Report Totals: |       |        |

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|---------------------------------|---------|-------------|---------------------------------------|-----------|---------------------------------------|-------------------|----------|--------------------|------------|---------------|----------|
|                                 | Month   | Tons        | <u>Dollars</u>                        | \$/Ton    | MMBTU's                               | <u>\$/mmbtu</u>   | Moisture | A-L                |            |               |          |
| Ending Inventory                | Aug-16  | 336,862.34  | 20,411,312.60                         | \$60.5924 | 8,223,133.3100                        | \$2.482182        | 7.71     | <u>Ash</u><br>9.68 | BTU        | <u>Sulfur</u> | Heat-EIA |
| hysical Inventory               | Sep-16  | <del></del> | · · · · · · · · · · · · · · · · · · · |           |                                       | 02.402102         | 1.71     | 9.00               | 12,245     | 3.43          |          |
| Purchases                       | Sep-16  | 60,425.59   | 3,659,824.34                          | \$60.5675 | 1,476,238.48                          | \$2.479155        | 8.30     | 9.07               |            |               |          |
| Station Transfer                | Sep-16  | <u> </u>    | <u> </u>                              | \$0.0000  | · · · · · · · · · ·                   | <i>*</i> 2.073233 | 8.50     | . 9.07             | 12,215     | 3.29          | 24.43    |
| Subtotal                        | Sep-16  | 397,287.93  | 24,071,136.94                         | \$60.5886 | 9,699,371.79                          | \$2.481721        | 7.80     | 9.59               |            |               |          |
| llaans 21.4                     | • · · · | 0.00        |                                       | \$0.0000  |                                       | , ,               | 7.00     |                    | 12,240     | 3.41          |          |
| Usage-H 1                       | Sep-16  | 19,831.99   | 1,201,593.38                          | \$60.5886 | 486,677.04                            | \$2.468975        | 8.84     | 7.96               |            | ····          |          |
| Jsage-H 2                       | Sep-16  | 21,865.06   | 1,324,774.34                          | \$60.5886 | 535,212.94                            | \$2.475229        | 8.86 1   | 8.18               | 12,270     | 3.17          |          |
| Isage by HMP&L(City)            | Sep-16  |             |                                       |           |                                       |                   | 0.00     | 0.10               | 12,239     | 3.27          | 24.4780  |
|                                 | · · · · |             | \$0.00                                |           | <u> </u>                              |                   |          |                    | - <u> </u> | ·             |          |
| Ending Inventory                | Sep-16  | 348,160.79  | 21,094,590.14                         | \$60.5886 | 8,495,388.96                          | \$2.483063        | 7.85     | 9.97               | 42 522     |               |          |
| Physical Inventory<br>Purchases | Oct-16  |             |                                       |           |                                       |                   | 7.05     | 3.37               | 12,500     | 3.51          |          |
| itation Transfer                | Oct-16  | 43,185.56   | 2,551,776.09                          | \$59.0886 | 1,054,663.25                          | \$2.419517        | 0.00     | 0.00               |            | ·             |          |
| Subtotal                        | Oct-16  | <u> </u>    |                                       | \$0.0000  | · · · · · · · · · · · · · · · · · · · |                   | 0.00     | 0.00               | 0          | 0.00          | 24.42    |
| oudiotai                        | Oct-16  | 391,346.35  | 23,646,366.23                         | \$60.4231 | 9,550,052.21                          | \$2.476046        | 6.98     | 8.87               | 11 121     |               |          |
| leago U 1                       | 0.146   | 0.00        | · · · · · · · · · · · · · · · · · · · | \$0.0000  | - · · · · · · · · ·                   | 1                 |          | 0.07               | 11,121     | 3.12          |          |
| Jsage-H 1                       | Oct-16  | 10,593.83   | 640,112.23                            | \$60.4231 | 262,472,73                            | \$2.438776        | 8.82     | 7.36               | 12,388     |               |          |
| Jsage-H 2                       | Oct-16  | 9,668.16    | 584,180.36                            | \$60.4231 | 240,621.17                            | \$2.427801        | 8.29     | 7.41               |            | 3.09          | 24.7760  |
| Isage by HMP&L(City)            | Oct-16  | )<br>       |                                       |           |                                       |                   |          | 7.41               | 12,444     | 3.05          | 24.8880  |
|                                 |         | ·           | \$0.00                                |           |                                       |                   |          |                    | n          |               |          |
| inding Inventory                | Oct-16  | 361,506.82  | 21,843,368.98                         | \$60.4231 | 8,813,730.52                          | \$2.478334        | 7.08     | 9.19               |            | 3.21          | -        |

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Case No. 2017-00006 Attachment 2 for Response to PSC 1-44 Witness: Nicholas R. Castlen Page 3 of 3

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In the Matter of:

## AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2014 THROUGH OCTOBER 31, 2016

Case No. 2017-00006

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CONFIDENTIAL ATTACHMENTS (INVOICES) Attachment 3 and Attachment 4 to

Item 44 of the Commission Staff's Data Request dated August 6, 2017 FILED: August 20, 2017

INFORMATION SUBMITTED UNDER PETITION FOR CONFIDENTIAL TREATMENT