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**BOEHM, KURTZ & LOWRY**

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**Via Overnight Mail**

September 19, 2017

Talina Mathews, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**Re: Case No. 2017-00287**

Dear Ms. Mathews:

Kentucky Industrial Utility Customers, Inc., (KIUC) mistakenly attached the incorrect document to its First Set of Data Requests to Big Rivers Electric Corporation previously filed in the above-referenced matter. In order to correct this error, attached please the original and ten (10) copies of the KIUC's Amended First Set of Data Request to Big Rivers Electric Corporation.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

MLKkew  
Attachment

cc: Certificate of Service  
Quang Nyugen, Esq.  
Richard Raff, Esq.

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter Of The Application Of: An Examination Of The : Case No. 2017-00287  
Application Of The Fuel Adjustment Clause Of Big Rivers Electric :  
Corporation From November 1, 2016 Through April 30, 2017 :

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**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'s**

**AMENDED**

**FIRST SET OF DATA REQUESTS  
TO  
BIG RIVERS ELECTRIC CORPORATION**

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Dated: September 18, 2017

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**SEP 20 2017**

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COMMISSION**

## DEFINITIONS

1. “Document(s)” is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, memoranda, reports, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.
2. “Correspondence” is used in its customary broad sense and includes electronic email, including all attachments, and all written mail, messages and communications between the persons or parties named in the request.
3. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final, and whether or not referred to in Big Rivers’ direct testimony.
4. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.
5. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
6. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
7. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
8. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
9. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
10. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
11. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
12. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
13. “BREC” or “Big Rivers” means Big Rivers Electric Corporation and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

**FIRST SET OF DATA REQUESTS OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.  
TO BIG RIVERS ELECTRIC CORPORATION  
Case No. 2017-00287**

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- Q.1-1. Please generally describe the process by which Big Rivers allocates fuel costs between native load and off-system sales for Fuel Adjustment Charge (FAC) purposes.
- Q.1-2. Are Big Rivers' lowest fuel cost generation resources assigned to native load in each hour in the FAC? Please explain.
- Q.1-3. Are system average fuel costs assigned to off-system sales in the FAC? Please explain.
- Q.1-4. Are system average fuel costs assigned to native load in the FAC? Please explain.
- Q.1-5. Please describe how purchase power costs are allocated between native load and off-system sales in the FAC process.
- Q.1-6. For each of the six months under review, please provide the fuel cost in \$/MWH that was assigned to: 1) native load; and 2) off-system sales.
- Q.1-7. For each of the six months under review, please provide the purchase power costs in \$/mwh that was assigned to: 1) native load; and 2) off-system sales.
- Q.1-8. Please confirm that the fuel costs of Wilson were included in the FAC process for each of the six months under review. If the fuel costs of Wilson were not included in the FAC please explain why not.
- Q.1-9. For each month during the period under review, please provide the following.
- a. Native load sales (MWH);
  - b. Generation by generating unit, and provide the allocation of the generation to native load customers and off-system sales (MWH);
  - c. Purchase power energy (MWH), and provide the allocation of the purchases to native load customers and off-system sales (MWH);
  - d. Losses (MWH)
  - e. Provide evidence of an energy balance between sales and generation for each period. If any other categories of energy are required to complete the energy balance, please provide those categories individually.
  - f. Generation fuel costs by generating unit, and provide the allocation of the generation fuel costs to native load customers and off-system sales;
  - g. Purchase power costs and the allocation of the purchase power costs to native load and off-system sales.
  - h. If any other categories of costs are allocated to either native load or off-system sales that have not been included in the above two questions, please provide those fuel costs by individual categories.

Please provide all data electronically, in spreadsheet format with all formulas intact.

- Q.1-10. Regarding Big Rivers' off-system sales profits, please provide the following by month for each month during the period under review:

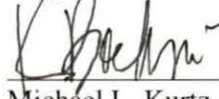
- a. Provide generation and purchase power (MWHs) allocated to off-system sales. In the case of Company generation, provide generation (MWHs) by generating unit. In the case of purchases, provide the purchase energy in total purchase MWHs.
- b. Please provide the generation and purchase power costs allocated to the off-system sales. In the case of Company generation, provide generation dollars by generating unit. In the case of purchases, provide the purchase cost in total purchase dollars.
- c. Provide the revenue received for the off-system sales.
- d. Provide the resulting profit for the off-system sales.

Please provide all calculations electronically, in spreadsheet format with all formulas intact.

Q.1-11. For each month during the period under review in this proceeding, please provide the dollar amount of fuel costs that would have been included in the calculation of the fuel adjustment clause if Big Rivers had assigned its lowest fuel cost generation to native load customers each hour and compare that amount to the dollar amount that was included in the calculation. Please provide the information in the same format as the Attachment to Big Rivers' Response to Commission Staff's Third Request for Information, Item No. 1.c. in Case No. 2014-00230. Please provide all workpapers electronically in spreadsheet format, with all formulas intact. In responding to this Request please ignore any dollar impacts associated with the \$311,111.11 monthly "FAC Credit" paid by Big Rivers pursuant to the Stipulation and Recommendation in Case No. 2014-00455.

*For ease of reference, Big Rivers' Response to Commission Staff's Third Request for Information, Item No. 1.c. in Case No. 2014-00230 is attached to these Data Requests.*

Respectfully submitted,



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Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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**COUNSEL FOR KENTUCKY INDUSTRIAL  
UTILITY CUSTOMERS, INC.**

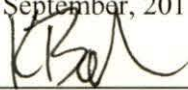
September 18, 2017

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

	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	Total
<b>As Filed:</b>							
Total Cost of Fuel for Generation Allocated to Native Load Sales (FAC filings), \$	\$ 11,117,156	\$ 11,677,597	\$ 13,277,071	\$ 5,640,044	\$ 4,813,373	\$ 3,939,896	\$ 50,465,137
Native Load Sales Volumes from Generation (MWh)	452,019.763	451,031.346	483,866.567	220,532.495	186,387.640	161,217.954	1,955,055.765
<b>Total Cost of Fuel for Generation Allocated to Native Load Sales (FAC filings), \$/MWh</b>	<b>\$ 24.59</b>	<b>\$ 25.89</b>	<b>\$ 27.44</b>	<b>\$ 25.57</b>	<b>\$ 25.82</b>	<b>\$ 24.44</b>	<b>\$ 25.81</b>
<b>Proforma - Estimated Fuel Cost by Ranking Generators for Native Load</b>							
Total Estimated Fuel Cost by Ranking Generators for Native Load - \$	\$ 10,510,259	\$ 10,986,613	\$ 12,710,987	\$ 5,297,757	\$ 4,521,992	\$ 3,742,670	\$ 47,770,276
Native Load Sales Volumes from Generation (MWh)	452,019.763	451,031.346	483,866.567	220,532.495	186,387.640	161,217.954	1,955,055.765
<b>Estimated Fuel Cost by Ranking Generators for Native Load - \$/MWh</b>	<b>\$ 23.25</b>	<b>\$ 24.36</b>	<b>\$ 26.27</b>	<b>\$ 24.02</b>	<b>\$ 24.26</b>	<b>\$ 23.21</b>	<b>\$ 24.43</b>
<b>Difference:</b>							
Difference in Total Fuel Cost Allocated to Native Load - \$	\$ 606,897	\$ 690,984	\$ 566,084	\$ 342,287	\$ 291,381	\$ 197,226	\$ 2,694,861
<b>Difference in Cost of Fuel for Generation Allocated to Native Load - \$/MWh</b>	<b>\$ 1.34</b>	<b>\$ 1.53</b>	<b>\$ 1.17</b>	<b>\$ 1.55</b>	<b>\$ 1.56</b>	<b>\$ 1.22</b>	<b>\$ 1.38</b>

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by electronic mail (when available) and by regular, U.S. mail, unless otherwise noted, this 19<sup>th</sup> day of September, 2017 to the following:



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Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

Big Rivers Electric Corporation

201 Third Street

P. O. Box 24

Henderson, KY 42420

Honorable James M Miller

Honorable Tyson A Kamuf

Sullivan, Mountjoy, Stainback & Miller, PSC

100 St. Ann Street

P.O. Box 727

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