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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

JUN 22 2018  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

2017 INTEGRATED RESOURCE PLAN )  
OF BIG RIVERS ELECTRIC CORPORATION )      CASE NO. 2017-00384

**ATTORNEY GENERAL'S INITIAL DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention ("Attorney General"), and submits these Initial Data Requests to Big Rivers Electric Corporation (hereinafter "Big Rivers" or "Company") to be answered by July 20, 2018, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.
- (6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

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

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

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

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership;

blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

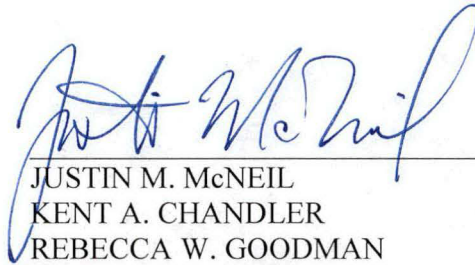
(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL

A handwritten signature in blue ink, appearing to read "Justin McNeil", is written over a horizontal line.

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1. Refer to page 18 of the Integrated Resource Plan (“IRP”). It states that “[t]he optimistic economy forecast scenario reflects growth for new industrial load.” The footnote attributed to this sentence states that Big Rivers’ projections of energy and peak demand is based in part on “new growth corresponding to potential customers that have a high likelihood of being served in future years.”
  - a. Explain how the Company determines the high likelihood of potential customers taking service in this projection.
  - b. Reconcile the above statements with the tables and statements on pages 56–58 of the IRP. The Large Commercial and Industrial section states that “[l]arge C&I sales for Big Rivers’ three Members are projected to be essentially flat after 2020, as the Long-Term Load Forecast only added known, anticipated changes.”
  - c. Explain whether growth from potential customers was factored into either of the Small Commercial & Industrial or the Large Commercial & Industrial classes.
  - d. Explain to what extent Big Rivers works with the Area Development Districts and/or Chambers of Commerce that exist within Big Rivers’ service territory to: (i) work to attract new commercial and industrial load; and (ii) identify existing load that may wish to add more load.
2. Has Big Rivers considered whether any of its current customers may move to generate their own electricity by 2036, either through CHP or other means?
  - a. If so, how has the Company planned to mitigate for this possibility?
  - b. If not, will the Company consider studying this in the near future?
  - c. If Big Rivers considers this customer self-generation/distributed generation within its Load Mitigation Plan, identify where the Plan does so.
3. Refer to pages 19 and 55 of the IRP. Provide the evidence, studies or otherwise, which indicate that appliance efficiencies are approaching maximum levels which will result in “relatively flat” average use per customer beyond 2024.
4. Refer to page 28 and 46 of the IRP. Explain whether the Company expects any further retail member-consumer owned PV generators larger than 30 kW to come online in the next three years, or any projects that have been announced or come online since the filing of this IRP.
  - a. Explain whether the seven educational solar arrays and web access mentioned are currently operational, and whether the Company has received feedback on this project. If so, explain the impacts so far and the nature and extent of the feedback.
  - b. Explain how this project factors into the Company’s projections for possible renewable generation growth in its territory over the next several years.
  - c. Explain any plans/projections for possible renewable generation growth in the Company’s territory over the next several years.

5. Fully explain whether the RPS scenario described on pages 133–134 is the only scenario in which Big Rivers would anticipate building substantial solar generation in the near future.
6. Reference page 40 of the IRP. Explain the specific efforts the Company has taken toward developing in-house expertise for price forecasting and MISO market knowledge as suggested in Recommendation 2 from the Focused Management Audit.
  - a. Is the restructuring of the Strategic Planning and Risk Management Department described on page 42 a direct result of this recommendation? Fully explain.
  - b. Aside from the restructuring above, have any other employees been hired or reassigned to this end?
  - c. In regards to Recommendation 2, explain how the scope of the development of the in-house expertise for price forecasting and MISO market knowledge is limited to Big Rivers' mission and core business.
7. Reference pages 40–41 of the IRP. Explain the progress the Company has made in commissioning a study on the future of the Coleman plant in regards to Recommendation 3 from the Focused Management Audit.
  - a. Has the Company determined a timeline for commencing and completing a study on Coleman?
  - b. Independent of any external study, has Big Rivers continued to internally explore each of the options available for Coleman, including sale, retirement, or redevelopment?
  - c. State whether Big Rivers has had any offers to purchase the Coleman plant since the completion of its last IRP.
  - d. What factors have changed since the Company's 2014 analysis of Coleman?
  - e. At what market prices, for both capacity and energy, would the Company support returning Coleman to service?
  - f. Fully explain the economics of a scenario where the Company decides to return Coleman to service.
  - g. Fully explain the steps needed to return Coleman to service.
  - h. Fully explain whether maintenance has been performed on the plant while idle, and what deferred maintenance would need to be done to return it to service.
  - i. Explain in full detail the environmental upgrades which would be required to return Coleman to service and in compliance with current standards. Include in your response the precise environmental regulations (whether state or federal) with which each such upgrade is intended to comply.
  - j. Explain in full detail the fully projected cost of returning Coleman to service, and separately break down the cost of maintenance and mandatory environmental upgrades.

8. Fully explain whether Big Rivers intends to keep Reid Unit 1 idled or return it to service, and describe the economic market conditions which would factor into this decision. Provide also any modelling data Big Rivers may have produced in this regard.
  - a. Provide the number of hours Reid Unit 1 was operated since the completion of Big Rivers' last IRP.
  - b. If Reid Unit 1 is returned to service, provide the remaining expected lifespan, taking into consideration any repairs or modifications the Company may make to the unit. If the remaining lifespan is unknown, provide the lifespan for comparable units having a similar age, run times and operating characteristics.
  
9. Fully explain how Big Rivers will decide whether to keep Wilson in service as a coal-fired plant or retire it by 2020.
  - a. Describe the economic market conditions that will be required to keep Wilson in service.
  - b. Provide any and all studies and analyses regarding Wilson's possible retirement.
  - c. Provide a schedule of planned outages for Wilson over the next five (5) years, including the types of O & M work planned, together with cost estimates.
  - d. Provide the current state of the Wilson FGD's compliance, together with any expected upgrades and cost estimates over the next five (5) years. Include in your response any analysis regarding whether any modification in fuel types may achieve comparable results for less cost.
  
10. Provide a discussion of the effect that compliance with: (i) CSAPR; (ii) ELG; and (iii) CCR will have on Big Rivers' fleet, together with any and all cost projections completed since the last IRP was completed.
  - a. Provide copies of any studies that Big Rivers, and/or any other entities on its behalf may have conducted in this regard.
  
11. Refer to Pg. 93, Table 6.2. The footnote regarding the Reid Combustion Turbine expected retirement date states that it "will depend greatly on the number of operating hours experienced over the next several years. With relatively low operating hours and continued maintenance, it should provide reasonably available capacity for a number of years into the future."
  - a. Explain what the Company means by "relatively low operating hours."
  - b. Explain what the Company means by "reasonably available capacity"
  - c. Explain what the Company means by "a number of years into the future"
  - d. Why can an expected retirement date not be estimated?
  - e. Provide the number of hours the Reid CT has run since the completion of Big Rivers' last IRP.

- f. Provide the remaining expected life span of the Reid CT. If the life span is unknown, provide the average life span of comparable units of that type having a similar age, run times and operating characteristics.
  - g. Provide details regarding any upgrades or modifications Big Rivers intends to make the Reid CT that will require any outages in excess of one week.
12. Fully explain whether a recent KPDES alleged discharge violation and ongoing testing at the Wilson plant has altered the Company's plans to keep the plant coal-fired and in service or to retire it.
- a. Explain whether this has any impact on the "relative low capital cost" to bring Wilson in compliance with CCR and ELG regulations as described at page 108 of the IRP, and/or any state environmental regulations.
  - b. Explain the Company's next steps in addressing the discharge violation.
  - c. Explain whether the Company has or plans to contract with any consultants and/or engineering firms regarding the alleged discharge.
  - d. Explain when the Company intends to conduct its next ground-well testing.
13. Explain whether the results of Big Rivers' most recent ground-water/ground-well testing at the Company's ash retention ponds, landfills, or other impoundments have led the company to revise any of its plans set forth in the current IRP. If so, describe in complete detail how.
- a. If any additional costs will be incurred to meet compliance with state and/or federal regulations, provide cost estimates.
  - b. If the Company is aware of any other potential effluent discharges that will need to be addressed in some manner, please identify each such potential discharge including the location, and the generating station where the potential discharge is or may be occurring.
  - c. Explain whether any remedial measures the Company may take to address any such discharges may affect its ability to utilize emission allowances anywhere within its fleet.
14. Refer to page 61 of the IRP. Fully explain the current status of off system sales to the Missouri municipals and Nebraska, together with any additional contracted off system sales, whether bilateral or otherwise.
- a. Explain the Company's long-term economic thinking in procuring these contracts, and whether they are achieving the results the Company hoped for in arranging them.
  - b. Explain whether these sales have begun to successfully stabilize revenue.
  - c. Fully explain whether anything has changed with the future KyMEA sale.



*Certificate of Service and Filing*

Counsel certifies that an original and ten (10) photocopies of the foregoing were served and filed by hand delivery to Gwen R. Pinson, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

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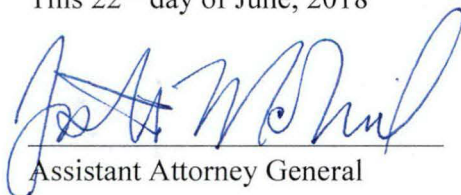
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This 22<sup>nd</sup> day of June, 2018

  
Assistant Attorney General