

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

APR 20 2018

APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR A CERTIFICATE OF
PUBLIC CONVENIENCE AND NECESSITY TO
CONSTRUCT AND ACQUIRE A 345 KV
TRANSMISSION LINE IN HANCOCK COUNTY,
KENTUCKY

) PUBLIC SERVICE
) COMMISSION
) CASE NO.
) 2018-00004
)
)

ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION

Comes now, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Data Request to Big Rivers Electric Corporation (hereinafter "Big Rivers") to be answered by the date specified in the Commission's Order of Procedure, 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 request 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. The Office of the Attorney General can provide counsel for Big Rivers with an electronic version of these questions, upon request.
- (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 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, please notify the Office of the Attorney General as soon as possible.

(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.

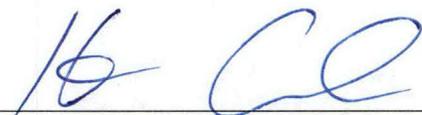
(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(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



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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Ms. Gwen 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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April 30, 2018

In the Matter of: Application of Big Rivers Electric Corporation for a
Certificate of Public Convenience and Necessity to Construct and Acquire a
345 KV Transmission Line in Hancock County, Kentucky
Case No. 2018-00004
Attorney General's Initial Request for Information

1. Reference the Asset Purchase Agreement (“APA”), SCHEDULE 2.02- Purchase Price Determination.
 - a. Provide the amounts expended to date for the categories listed under “1. Cost Tracking a. Kentucky Costs.”
 - b. Provide the amounts expended to date for the categories listed under “1. Cost Tracking c. General Costs.”
 - c. Provide the “Kentucky Miles” and “Total Miles” to be used in the referenced equation under “2. Purchase Price.”
2. Reference the APA, generally.
 - a. Confirm that should the Commission find the APA does require Commission approval, the APA provides for ongoing Commission jurisdiction.
 - i. If confirmed, provide citation in the record to same.
3. Reconcile the \$6M purchase price provided on page 7, line 18 of the Direct Testimony of Michael W. Chambliss (“Chambliss testimony”) with the cost estimates of three proposed routes on pages 93 and 94 of the April 21, 2016 Technical Report.
4. Refer to the Application pg. 4. Quantify the congestion on the MISO system near Newtonville, IN/Coleman, or describe the magnitude of the congestion.
 - a. If possible, fully describe and quantify the degree to which this project will improve the congestion.
 - b. If possible, fully describe and quantify the degree to which the project will strengthen the 345kV backbone.
 - c. Fully explain the increase in Big Rivers’ ability to import/export power.
5. Refer to the Application pg. 4. Fully explain the expected economic expansion/employment opportunities which will result from this project.
 - a. Provide any studies or analyses Big Rivers, Republic, or MISO conducted to support this.
6. Refer to Chambliss testimony, pg. 3. Regarding the expected January 1, 2021 date for the project to be in service, did MISO establish this date by which the project must be completed?
 - a. Did MISO specify a date by which the project must be commenced? Fully explain the project’s expected timeline, and any requirement(s) thereof.

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7. Refer to Chambliss testimony, pg. 7. Describe the methodology Big Rivers will use to determine whether the Purchased Assets are acceptable or not upon final completion of the project.
 - a. Confirm whether the entirety of this methodology is memorialized in the Selected Developer Agreement between Big Rivers and Republic.