



201 Third Street
P.O. Box 24
Henderson, KY 42419-0024
270-827-2561
www.bigrivers.com

August 15, 2018

RECEIVED

AUG 16 2018

PUBLIC SERVICE
COMMISSION

VIA OVERNIGHT DELIVERY

Ms. Gwen R. Pinson
Executive Director
Public Service Commission
211 Sower Boulevard, P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: *In the Matter of: Notice of Termination of Contracts and Application of Big Rivers Electric Corporation for a Declaratory Order and for Authority to Establish a Regulatory Asset—Case No. 2018-00146*

Dear Ms. Pinson:

The Public Service Commission entered an order in the above-referenced matter directing Big Rivers Electric Corporation to file responses to Items 18-21, 24, and 26 of the First Set of Data Requests of Kentucky Industrial Utility Customers, Inc. Enclosed for filing are an original and ten (10) of Big Rivers' responses to those information requests.

I certify that, on this date, copies of this letter were served on each of the persons listed on the attached service list by overnight delivery.

Please confirm the Commission's receipt of this information by placing the Commission's date stamp on the enclosed additional copy and returning it to Big Rivers in the self-addressed, postage paid envelope provided; and please feel free to contact me with any questions you may have about this filing.

Sincerely,

A handwritten signature in blue ink, appearing to read "TK", is written over a faint, larger version of the signature.

Tyson Kamuf
Corporate Attorney,
Big Rivers Electric Corporation

cc: Service list

BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG
RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND
FOR AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

Service List

Hon. Kent A. Chandler
Hon. Justin M. McNeil
Hon. Lawrence W. Cook
Hon. Rebecca Goodman
Assistant Attorneys General
700 Capital Avenue
Capital Building, Suite 20
Frankfort, KY 40601-3415
Kent.Chandler@ky.gov
Justin.McNeil@ky.gov
Larry.Cook@ky.gov
Rebecca.Goodman@ky.gov
Phone: 502-696-5453; Fax: 502 573-1005

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 E. Seventh St., Suite 1510
Cincinnati, OH 45202-4454
MKurtz@BKLLawfirm.com
KBoehm@BKLLawfirm.com
JKylerCohn@BKLLawfirm.com
Phone: 513-421-2255; Fax: 513-421-2764

ORIGINAL



Your Touchstone Energy® Cooperative 

RECEIVED

AUG 16 2018

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

**NOTICE OF TERMINATION OF CONTRACTS)
AND APPLICATION OF BIG RIVERS)
ELECTRIC CORPORATION FOR A)
DECLARATORY ORDER AND FOR)
AUTHORITY TO ESTABLISH A REGULATORY)
ASSET)**

**Case No.
2018-00146**

**Response to Items Nos. 18 through 21, 24, and 26 of
the Kentucky Industrial Utility Customers, Inc.'s
Initial Request for Information
dated June 15, 2018**

FILED: August 16, 2018

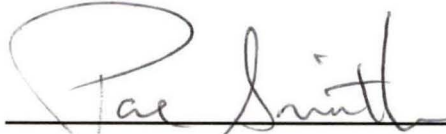
ORIGINAL

BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND FOR AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

VERIFICATION

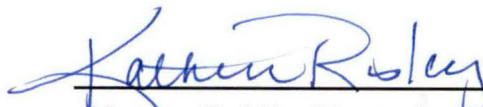
I, Paul G. Smith, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Paul G. Smith

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

15th SUBSCRIBED AND SWORN TO before me by Paul G. Smith on this the
day of August, 2018.



Notary Public, Kentucky State at Large

My Commission Expires

October 31, 2020



BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG
RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND FOR
AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

**Response to the Kentucky Industrial Utility Customers, Inc.'s
First Request for Information
dated June 18, 2018**

August 16, 2018

1 **Item 18)** *Provide the deferred depreciation regulatory asset for Coleman*
2 *plant at the end of each month from December 2016 through the most recent*
3 *month for which the actual information is available.*

4

5 **Response)** Please see attached document.

6

7

8 **Witness)** Paul G. Smith

9

Big Rivers Electric Corporation
Case No. 2018-00146
Coleman Plant & Wilson Plant
Deferred Depreciation Regulatory Asset Balance

Line No.	Month	Coleman Plant	Wilson Plant
1	12/31/16	\$ 19,623,256.93	\$ 58,990,746.09
2	01/31/17	\$ 20,117,563.42	\$ 60,690,222.83
3	02/28/17	\$ 20,611,869.91	\$ 62,389,699.57
4	03/31/17	\$ 21,106,176.40	\$ 64,089,176.31
5	04/30/17	\$ 21,600,482.89	\$ 65,788,653.05
6	05/31/17	\$ 22,094,789.38	\$ 67,488,129.79
7	06/30/17	\$ 22,589,095.87	\$ 69,187,606.53
8	07/31/17	\$ 23,083,407.15	\$ 70,887,087.68
9	08/31/17	\$ 23,577,312.03	\$ 72,586,565.52
10	09/30/17	\$ 24,071,519.01	\$ 74,286,043.36
11	10/31/17	\$ 24,565,759.15	\$ 75,985,551.83
12	11/30/17	\$ 25,059,970.86	\$ 77,693,949.49
13	12/31/17	\$ 25,554,185.08	\$ 79,395,477.52
14	01/31/18	\$ 26,048,397.08	\$ 81,095,910.10
15	02/28/18	\$ 26,542,609.08	\$ 82,796,342.68
16	03/31/18	\$ 27,036,821.08	\$ 84,496,775.26
17	04/30/18	\$ 27,531,033.08	\$ 86,197,207.84
18	05/31/18	\$ 28,016,524.13	\$ 87,897,646.11
19	06/30/18	\$ 28,502,020.13	\$ 89,598,088.95
20	07/31/18	\$ 28,987,526.48	\$ 91,298,541.35

BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG
RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND FOR
AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

**Response to the Kentucky Industrial Utility Customers, Inc.'s
First Request for Information
dated June 18, 2018**

August 16, 2018

1 **Item 19)** *Provide the deferred depreciation regulatory asset for Wilson*
2 *plant at the end of each month from December 2016 through the most recent*
3 *month for which the actual information is available.*

4

5 **Response)** Please see the attachment provided with Big Rivers' response to Item
6 18 of the KIUC's first request for information in this case.

7

8

9 **Witness)** Paul G. Smith

10

BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG
RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND FOR
AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

**Response to the Kentucky Industrial Utility Customers, Inc.'s
First Request for Information
dated June 18, 2018**

August 16, 2018

1 **Item 20)** *Provide the gross plant and accumulated depreciation for*
2 *Coleman plant at the end of each month from December 2016 through the*
3 *most recent month for which actual information is available.*

4

5 **Response)** Please see attached document.

6

7

8 **Witness)** Paul G. Smith

9

Big Rivers Electric Corporation
Case No. 2018-00146
Coleman Plant & Wilson Plant
Gross Plant and Accumulated Depreciation

Line No.	Month	Coleman Plant		Wilson Plant	
		Gross Plant Balance	Accumulated Depreciation Balance	Gross Plant Balance	Accumulated Depreciation Balance
1	12/31/16	\$ 270,531,348.97	\$ (108,937,799.20)	\$ 930,843,412.10	\$ (522,509,851.96)
2	01/31/17	\$ 270,531,348.97	\$ (109,431,316.96)	\$ 930,843,412.10	\$ (524,222,352.89)
3	02/28/17	\$ 270,531,348.97	\$ (109,924,834.72)	\$ 930,843,412.10	\$ (525,932,922.12)
4	03/31/17	\$ 270,531,348.97	\$ (110,418,352.48)	\$ 930,607,557.10	\$ (527,639,561.61)
5	04/30/17	\$ 270,531,348.97	\$ (110,911,870.24)	\$ 930,607,557.10	\$ (529,307,919.10)
6	05/31/17	\$ 270,531,348.97	\$ (111,405,388.00)	\$ 930,607,557.10	\$ (531,012,517.57)
7	06/30/17	\$ 270,531,348.97	\$ (111,898,905.76)	\$ 930,607,557.10	\$ (532,718,034.36)
8	07/31/17	\$ 270,531,348.97	\$ (112,392,423.52)	\$ 930,607,557.10	\$ (534,431,899.24)
9	08/31/17	\$ 270,501,436.17	\$ (112,854,773.80)	\$ 930,607,557.10	\$ (536,133,961.56)
10	09/30/17	\$ 270,501,436.17	\$ (113,348,190.85)	\$ 930,607,557.10	\$ (537,843,330.63)
11	10/31/17	\$ 270,501,436.17	\$ (113,841,607.90)	\$ 930,607,557.10	\$ (539,554,598.48)
12	11/30/17	\$ 270,501,436.17	\$ (114,335,024.95)	\$ 930,577,058.47	\$ (540,468,619.39)
13	12/31/17	\$ 270,501,436.17	\$ (114,828,441.97)	\$ 930,547,949.10	\$ (540,908,789.00)
14	01/31/18	\$ 270,501,436.17	\$ (115,321,859.02)	\$ 930,547,949.10	\$ (542,619,008.03)
15	02/28/18	\$ 270,501,436.17	\$ (115,815,276.07)	\$ 930,547,949.10	\$ (544,324,692.39)
16	03/31/18	\$ 270,501,436.17	\$ (116,308,693.12)	\$ 930,547,949.10	\$ (546,031,196.11)
17	04/30/18	\$ 270,501,436.17	\$ (116,802,110.17)	\$ 930,547,949.10	\$ (547,736,197.23)
18	05/31/18	\$ 270,501,436.17	\$ (117,286,800.12)	\$ 930,547,949.10	\$ (549,446,542.97)
19	06/30/18	\$ 270,501,436.17	\$ (117,771,490.07)	\$ 930,547,949.10	\$ (551,153,823.23)
20	07/31/18	\$ 270,501,436.17	\$ (118,256,180.02)	\$ 930,547,949.10	\$ (552,865,056.73)

Case No. 2018-00146

Attachment for Responses to KIUC 1-20 and 1-21

Witness: Paul G. Smith

Page 1 of 1

BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG
RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND FOR
AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

**Response to the Kentucky Industrial Utility Customers, Inc.'s
First Request for Information
dated June 18, 2018**

August 16, 2018

1 **Item 21)** *Provide the gross plant and accumulated depreciation for*
2 *Wilson plant at the end of each month from December 2016 through the most*
3 *recent month for which actual information is available.*

4

5 **Response)** Please see the attachment provided in Big Rivers' response to Item 20
6 of the KIUC's first request for information in this case.

7

8

9 **Witness)** Paul G. Smith

10

BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG
RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND FOR
AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

**Response to the Kentucky Industrial Utility Customers, Inc.'s
First Request for Information
dated June 18, 2018**

August 16, 2018

1 **Item 24)** *Provide the gross plant and accumulated depreciation for each*
2 *of Big Rivers generating plants, including Station Two, but excluding*
3 *Coleman, and Wilson, at the end of each month from December 2016 through*
4 *the most recent month for which actual information is available.*

5

6 **Response)** Please see attached document.

7

8

9 **Witnesses)** Paul G. Smith

10

Big Rivers Electric Corporation
Case No. 2018-00146
Green Plant, Reid Plant & Station Two
Gross Plant and Accumulated Depreciation

Line No.	Month	Green Plant		Reid Plant		Station Two	
		Gross Plant Balance	Accumulated Depreciation	Gross Plant Balance	Accumulated Depreciation	Gross Plant Balance	Accumulated Depreciation
1	12/31/16	\$ 432,399,590.00	\$ (260,793,642.68)	\$ 23,806,001.56	\$ (16,848,223.11)	\$ 116,216,827.44	\$ (26,256,568.75)
2	01/31/17	\$ 432,399,590.00	\$ (261,580,666.40)	\$ 23,806,001.56	\$ (16,884,905.46)	\$ 116,216,827.44	\$ (26,545,956.10)
3	02/28/17	\$ 432,634,814.92	\$ (262,051,900.27)	\$ 23,806,001.56	\$ (16,921,889.54)	\$ 116,216,827.44	\$ (26,840,846.25)
4	03/31/17	\$ 432,431,647.05	\$ (262,678,466.78)	\$ 23,808,906.48	\$ (16,959,025.81)	\$ 116,225,631.28	\$ (27,135,255.46)
5	04/30/17	\$ 432,461,693.98	\$ (263,304,913.04)	\$ 23,815,935.58	\$ (16,980,365.56)	\$ 116,572,796.39	\$ (27,332,064.46)
6	05/31/17	\$ 432,471,313.03	\$ (264,096,500.50)	\$ 23,815,935.58	\$ (17,017,613.17)	\$ 116,572,796.39	\$ (27,400,632.43)
7	06/30/17	\$ 432,471,313.03	\$ (264,875,524.24)	\$ 23,815,935.58	\$ (17,054,860.81)	\$ 116,572,796.39	\$ (27,658,642.40)
8	07/31/17	\$ 432,471,313.03	\$ (265,656,130.55)	\$ 23,815,935.58	\$ (17,092,108.40)	\$ 116,575,088.67	\$ (27,827,729.78)
9	08/31/17	\$ 432,537,312.78	\$ (266,325,015.92)	\$ 23,816,849.07	\$ (17,125,770.21)	\$ 116,576,128.64	\$ (27,946,392.90)
10	09/30/17	\$ 432,706,042.94	\$ (266,277,417.68)	\$ 23,816,849.07	\$ (17,163,020.09)	\$ 117,763,011.37	\$ (28,063,879.01)
11	10/31/17	\$ 434,151,675.72	\$ (266,196,109.41)	\$ 23,816,849.07	\$ (17,199,956.57)	\$ 118,049,743.09	\$ (28,030,542.83)
12	11/30/17	\$ 434,536,125.40	\$ (266,473,453.24)	\$ 23,816,849.07	\$ (17,237,206.43)	\$ 118,069,376.26	\$ (28,322,082.98)
13	12/31/17	\$ 434,874,872.11	\$ (267,163,187.46)	\$ 23,812,287.34	\$ (17,269,594.76)	\$ 118,250,117.42	\$ (28,453,763.72)
14	01/31/18	\$ 434,932,989.15	\$ (267,935,454.80)	\$ 23,812,287.34	\$ (17,306,836.96)	\$ 118,250,117.42	\$ (28,660,376.51)
15	02/28/18	\$ 434,943,172.96	\$ (268,729,320.12)	\$ 23,812,287.34	\$ (17,344,079.17)	\$ 118,250,117.42	\$ (28,955,003.53)
16	03/31/18	\$ 435,402,489.22	\$ (269,284,545.06)	\$ 23,827,830.11	\$ (17,379,008.02)	\$ 118,310,579.77	\$ (29,199,945.79)
17	04/30/18	\$ 435,402,489.22	\$ (270,088,104.17)	\$ 23,827,830.11	\$ (17,416,273.45)	\$ 118,310,579.77	\$ (29,490,232.32)
18	05/31/18	\$ 435,512,304.51	\$ (270,889,769.31)	\$ 23,827,830.11	\$ (17,453,538.87)	\$ 118,530,146.69	\$ (29,813,415.06)
19	06/30/18	\$ 436,768,186.79	\$ (271,561,770.23)	\$ 23,827,830.11	\$ (17,490,976.41)	\$ 118,530,146.69	\$ (30,043,855.41)
20	07/31/18	\$ 436,935,348.80	\$ (272,196,626.33)	\$ 23,827,830.11	\$ (17,528,413.95)	\$ 118,756,213.69	\$ (30,278,414.12)

BIG RIVERS ELECTRIC CORPORATION

**NOTICE OF TERMINATION OF CONTRACTS AND APPLICATION OF BIG
RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER AND FOR
AUTHORITY TO ESTABLISH A REGULATORY ASSET
CASE NO. 2018-00146**

**Response to the Kentucky Industrial Utility Customers, Inc.'s
First Request for Information
dated June 18, 2018**

August 16, 2018

1 **Item 26)** *For each of the last ten years, provide the average price of power*
2 *in total and by component (e.g. energy, demand, FAC, environmental*
3 *surcharge and all other riders) for service to the Rural Class and Large*
4 *Industrial Class.*

5

6 **Response)** Please see attached.

7

8

9 **Witness)** Paul G. Smith

10

Big Rivers Electric Corporation
Case No. 2018-00146
Rural Class and Large Industrial Class
Average Price of Power - In Total and by Component

\$/MWh									
RURAL CLASS	DEMAND \$/kW	ENERGY	OTHER REVENUE & ADJUSTMENTS	REFUND PER PSC FINAL ORDER CN 2011-00036	PSC CN 2012-00535 SUBJECT TO ES CALC	REFUND PER PSC FINAL ORDER CN 2013-00199	FUEL ADJUSTMENT CLAUSE (FAC)	ENVIRONMENTAL SURCHARGE (ES)	UNWIND SURCREDIT (US)
2009	7.37	20.40	0.00	-	-	-	4.41	1.04	(1.51)
2010	7.37	20.40	0.00	-	-	-	10.15	2.24	(3.30)
2011	8.11	26.21	0.00	(0.24)	-	-	4.46	2.16	(3.49)
2012	9.50	29.74	0.00	-	-	-	2.89	2.25	(4.20)
2013	11.39	31.09	0.00	-	0.04	-	3.09	3.09	(3.31)
2014	15.73	42.02	0.00	-	-	(2.73)	3.23	4.28	(0.15)
2015	13.81	45.00	(0.00)	-	-	-	1.81	4.05	-
2016	13.81	45.00	0.00	-	-	-	0.40	5.70	-
2017	13.81	45.00	0.00	-	-	-	1.24	6.63	-

\$/MWh									
LARGE INDUSTRIAL CLASS	DEMAND \$/kW	ENERGY	OTHER REVENUE & ADJUSTMENTS	REFUND PER PSC FINAL ORDER CN 2011-00036	PSC CN 2012-00535 SUBJECT TO ES CALC	REFUND PER PSC FINAL ORDER CN 2013-00199	FUEL ADJUSTMENT CLAUSE (FAC)	ENVIRONMENTAL SURCHARGE (ES)	UNWIND SURCREDIT (US)
2009	10.15	13.72	0.11	-	-	-	4.55	1.08	(1.58)
2010	10.15	13.72	0.18	-	-	-	10.16	2.26	(3.30)
2011	10.33	20.08	0.17	(0.23)	-	-	4.56	2.17	(3.49)
2012	10.50	24.51	0.23	-	-	-	2.92	2.18	(4.20)
2013	10.77	26.42	0.27	-	(0.34)	-	3.11	2.54	(3.31)
2014	11.76	37.15	0.28	-	-	(1.70)	3.18	3.33	(0.14)
2015	10.69	38.04	0.29	-	-	-	1.89	3.13	-
2016	10.72	38.05	0.41	-	-	-	0.38	4.66	-
2017	10.72	38.05	0.08	-	-	-	1.27	4.98	-

Big Rivers Electric Corporation
Case No. 2018-00146
Rural Class and Large Industrial Class
Average Price of Power - In Total and by Component

	\$/MWh									\$/MWh
RURAL CLASS	NON-FAC PPA	NON-FAC PPA 2	MEMBER RATE STABILITY MECHANISM (MRSM)	EXPENSE MITIGATION ADJUSTMENT (EMA)	FUEL ROLL-IN MRSM ADJUSTMENT	MRSM TO OFF-SET BASE RATE	PSC CN 2013-00199 MRSM REFUND TO ER FUND	MRSM ECONOMIC RESERVE (ER)	MRSM RURAL ECONOMIC RESERVE (RER)	AVERAGE BILLED REVENUE
2009	-	-	(3.93)	-	-	-	-	-	-	37.00
2010	-	-	(4.77)	(3.30)	-	-	-	-	-	37.26
2011	(0.31)	-	(3.13)	3.01	(6.07)	-	-	-	-	40.58
2012	(1.04)	(0.10)	(0.94)	5.04	(10.21)	-	-	-	-	44.46
2013	(0.83)	(0.21)	(2.86)	6.51	(10.21)	-	-	-	-	51.17
2014	(0.12)	-	(7.36)	7.98	(10.21)	(13.33)	2.73	-	-	61.59
2015	0.63	-	-	-	-	-	-	(3.26)	(14.99)	64.10
2016	1.11	-	-	-	-	-	-	(1.31)	(9.09)	71.81
2017	1.34	-	-	-	-	-	-	(1.54)	-	83.60

	\$/MWh									\$/MWh
LARGE INDUSTRIAL CLASS	NON-FAC PPA	NON-FAC PPA 2	MEMBER RATE STABILITY MECHANISM (MRSM)	EXPENSE MITIGATION ADJUSTMENT (EMA)	FUEL ROLL-IN MRSM ADJUSTMENT	MRSM TO OFF-SET BASE RATE	PSC CN 2013-00199 MRSM REFUND TO ER FUND	MRSM ECONOMIC RESERVE (ER)	MRSM RURAL ECONOMIC RESERVE (RER)	AVERAGE BILLED REVENUE
2009	-	-	(4.06)	-	-	-	-	-	-	32.55
2010	-	-	(4.76)	(3.34)	-	-	-	-	-	33.93
2011	(0.34)	-	(3.24)	3.02	(6.07)	-	-	-	-	35.39
2012	(1.04)	(0.10)	(0.90)	5.00	(10.21)	-	-	-	-	37.04
2013	(0.83)	(0.22)	(2.34)	6.49	(10.21)	-	-	-	-	40.94
2014	(0.11)	-	(6.37)	8.00	(10.21)	(9.06)	1.70	-	-	47.62
2015	0.64	-	-	-	-	-	-	(2.04)	(10.27)	50.90
2016	1.12	-	-	-	-	-	-	(0.87)	(0.10)	62.98
2017	1.34	-	-	-	-	-	-	(0.97)	-	64.52