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JAN 22 2020

PUBLIC SERVICE  
COMMISSION

**Via Overnight Mail**

January 21, 2020

Gwen R. Pinson, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**Re: Case No. 2019-00269**

Dear Ms. Pinson:

Please find enclosed the original (unbound) and ten (10) copies of the MOTION TO AMEND EXHIBITS OF BIG RIVERS ELECTRIC CORPORATION for filing in the above-referenced matter.

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

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

RECEIVED

JAN 22 2020

PUBLIC SERVICE  
COMMISSION

**IN THE MATTER OF:**

**APPLICATION OF BIG RIVERS )  
ELECTRIC CORPORATION FOR ) CASE NO. 2019-00269  
ENFORCEMENT OF RATE AND )  
SERVICE STANDARDS. )**

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**MOTION TO AMEND EXHIBITS  
OF BIG RIVERS ELECTRIC CORPORATION**

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Pursuant to 807 KAR 5:001, Sections 4(5) and 5, Big Rivers Electric Corporation (“Big Rivers”) hereby moves the Kentucky Public Service Commission for permission to amend Exhibits Smith-1, Smith-4, and Smith-5, which were attached to the Direct Testimony of Paul G. Smith filed July 31, 2019 in the above-captioned proceeding (“Testimony”). Since the time the Testimony was filed, the portion of Station Two decommissioning costs owed by the City of Henderson, Kentucky and City of Henderson Utility Commission (collectively, “Henderson”) to Big Rivers has increased substantially. Specifically, the total amount of decommissioning costs due to Big Rivers has grown from \$134,098 as of June 30, 2019 to \$716,458 as of December 31, 2019. This has been slightly offset by an increase in the amount of operating costs owed by Big Rivers to Henderson, which has grown from \$798,261 as of June 30, 2019 to \$941,581 as of December 31, 2019. Taking both of these changes into account, the total amount that is immediately owed to Big Rivers pursuant to the terms of its Contracts with Henderson has risen from the \$718,942 reflected in the July 31, 2019 version of Exhibit Smith-1 to \$1,157,982.

Accordingly, given the material increase in costs owed to Big Rivers by Henderson pursuant to the Contracts and in the interests of a complete record upon which the Commission may base its ultimate decision in this case, Big Rivers respectfully requests that the Commission permit Amended Exhibits Smith-1, Smith-4, and Smith-5 (included as attachments to this Motion) to be part of the record in this proceeding.

Respectfully submitted,



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**COUNSEL FOR BIG RIVERS ELECTRIC  
CORPORATION**

January 21, 2020

**Big Rivers Electric Corporation**  
**Interim Accounting Summary**  
**Amounts Due (To) / From Henderson**  
**Updated through December 31, 2019**

<u>Description</u>	<u>Reference</u>	<u>Amount (\$)</u> <u>Due (To)/From</u>
Excess Henderson Energy	Exhibit Smith-2	(3,310,482)
Henderson Native Load	Exhibit Smith-3	4,693,587
Other Operating Costs	Exhibit Smith-4	(941,581)
Decommissioning Costs	Exhibit Smith-5	716,458
Total		<u>1,157,982</u>

**Big Rivers Electric Corporation**  
**Amounts Due (To) / From Henderson**  
**Other Operating Costs**  
Updated through December 31, 2019

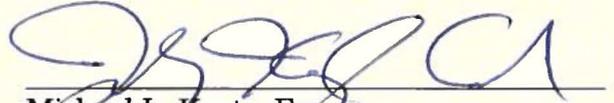
Description	Amount (\$) Due (To)/From
<u>Annual Settlement</u>	
Fiscal Year 2017 / 2018 Settlement True-up	(1,649,923)
Fiscal Year 2018 / 2019 Settlement True-up	(793,170)
<u>Auxiliary Power</u>	
October 2018 Auxiliary Power	21,155
November 2018 Auxiliary Power	17,886
December 2018 Auxiliary Power	13,815
January 2019 Auxiliary Power	25,895
<u>MISO Fees</u>	
December 2010 - May 2016	1,422,761
Total Other Operating Costs	(941,581)

**Big Rivers Electric Corporation**  
**Amounts Due (To) / From Henderson**  
**Decommissioning Costs**  
**Updated through December 31, 2019**

<b>Description</b>	<b>Amount (\$)</b> <b>Due (To)/From</b>
<hr/>	
<u>Decommissioning Costs</u>	
January 2019 - December 2019	716,458
	<hr/>
Total Decommissioning Costs	716,458
	<hr/> <hr/>

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by electronic mail and regular U.S. Mail (unless otherwise noted) this 21<sup>st</sup> day of January, 2020 to the following:



Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.

John N. Hughes, Esq.  
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(VIA OVERNIGHT MAIL)

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