

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	CASE NO.
CLAUSE OF BIG RIVERS ELECTRIC	)	2023-00013
CORPORATION FROM NOVEMBER 1, 2020	)	
THROUGH OCTOBER 31, 2022	)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 17, 2023. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

BREC shall make timely amendment to any prior response if BREC obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which BREC fails or refuses to furnish all or part of the requested information, BREC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, BREC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to BREC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 4. Explain BREC's plans for the PY25-26 winter season.

2. Refer to BREC's response to Staff's Second Request, Item 5. Regarding Item 5c, the four items mentioned do not appear to have been included in the response. Provide the four items.

3. Refer to BREC's response to Staff's Second Request, Item 14.
  - a. Explain whether BREC has any future plans to employ any gas traders to handle the necessary spot market gas procurement for its units.
  - b. Explain how much BREC has paid for the services it receives from ACES.
4. Refer to BREC's response to Staff's Second Request, Item 15. The response seems to indicate that when electricity demand is high and when BREC's Green and Reid units may be profitable, it may not be able to transport spot gas to its city gate. Consequently, it may be paying more for energy than it would otherwise. Explain whether BREC has performed a study to determine whether it would be worthwhile to obtain firm transmission pipeline transportation.
5. Refer to BREC's response to Staff's Second Request, Item 15b. Explain in detail what BREC means by "ACES nominates gas with the natural gas supplier selected."
6. Refer to BREC's response to Staff's Second Request, Item 17.
  - a. With respect to coal prices, the response provided is not clear. Explain how burning less coal compensates for higher prices as a justification for leaving the base fuel rate unchanged.
  - b. Confirm that natural gas prices are not expected to be higher in the next two-year period than they are currently.
7. Refer to BREC's response to Staff's Second Request, Item 26. In the spreadsheet, using the BREC.WISON1 tab as an example, confirm that various OFFER\_QTY and OFFER\_PRICE tabs represent the unit's offer curve at various levels

of output and the DA Clearing tab represents the level of output that was cleared in the market at any given hour.

8. Explain in detail the circumstances that would result in BREC reporting a negative dollar value for a Coal burned, Pet Coke burned, Oil burned, Gas burned, or Propane burned under Company Generation in its FAC Form A rate sheet filing.



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Public Service Commission  
P.O. Box 615  
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DATED NOV 01 2023

cc: Parties of Record

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