

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2023 INTEGRATED RESOURCE)	CASE NO.
PLAN OF BIG RIVERS ELECTRIC)	2023-00310
CORPORATION)	

COMMISSION STAFF'S FIRST 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 January 5, 2024. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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 2023 Integrated Resource Plan (IRP), Section 2, page 19. Provide an update to the solar power purchase agreement based in Henderson/Webster Counties.

2. Refer to the IRP, Section 2, page 25; Table 2.2.8(a), page 28; Section 4, Table 4.2(a), page 66; and Table 4.3(a), page 67.

- a. Explain whether BREC is generating and transmitting energy to serve its Non-Member customers during the time it has a system peak.
 - b. If so, explain why Table 2.2.8 does not include the coincident MW and MWh contributions associated with the non-Member load.
 - c. Explain whether MISO considers BREC's obligation to serve non-Members such that the non-Member load is reflected in BREC's planning reserve margin requirement (PRMR).
3. Refer to the IRP, Section 2, Table 2.2.8(a), page 28.
 - a. In the Rural Annual CP column, beginning in 2021-2023, there is a large increase, a decrease, and then large increase in CP. Explain the apparent gain, and loss in coincident peak demand.
 - b. Explain why the AUX CP column has no forecasted values.
 4. Refer to the IRP, Section 3, page 40. State how BREC determined the optimal number of years to use to determine weather averages, considering the effect of sample size and temperatures trending upwards.
 5. Refer to the IRP, Section 3, pages 41-42. Refer also to BREC's Application, Exhibit D, page 9, in Case No. 2022-00433.² Reconcile the statement in the IRP that BREC had no Critical Infrastructure Protection (CIP) non-compliance items with the assertions of need in Case No. 2022-00433 for security upgrades to comply with North American Electric Reliability Corporation (NERC) regulations.

² Case No. 2022-00433, *Electronic Application of Big Rivers Electric Corporation for a Certificate of Public Convenience and Necessity Authorizing Construction of a New Transmission Operations Center and an Order Authorizing Big Rivers to Dispose of Property* (filed Dec. 22, 2022).

6. Refer to the IRP, Section 3, page 44. State how BREC decided on bill credits based on 40 percent of margins earned in excess of 1.30 Times Income Earned Ratio (TIER).

7. Refer to IRP, Section 3, page 57 and Section 7, page 142. State how the enactment of KRS 278.264 changed BREC's capacity modeling and affected the cost of IRP plan alternatives.

8. Refer to the IRP, Section 4, Footnote 70 and Table 4.4(a), page 69; and Section 7, Footnote 83 and Table 7.1.6(a), page 132.

a. Explain how the energy per the Kentucky Municipal Electric Association (KYMEA) contract is actually provided.

b. If not on a call basis, explain why BREC is modeling this energy different from the way it's actually provided and different from its load forecast.

c. The modeled Non-Member energy usage depicted in Table 7.1.6(a) is significantly less than that depicted in Table 4.4(a), page 69. Reconcile the differences.

9. Refer to the IRP, Section 2, Table 2.2.8(a), page 28; Section 4, Table 4.3(a), page 67; and Section 7, Table 7.1.6(a), page 132. Reconcile the apparent differences between member Annual Peaks.

10. Refer to the IRP, Section 4, Table 4.3(a), page 67.

a. Confirm that Non-Member sales are designated in MW, and explain if it cannot be confirmed.

b. Provide a metric for each of the values listed in Table 4.3(a).

11. Refer to the IRP, Section 5, page 75. Explain why demand-side management (DSM) projections were limited to a ten-year period.

12. Refer to the IRP, Section 5, page 76. Provide all end-use survey data used to predict load.

13. Refer to the IRP, Section 7, page 105.

a. Explain the rationale for simulating a typical two day week as opposed to a seven-day week.

b. Define typical, as used therein, and explain the determination of a typical two-day week, 52 weeks per year.

14. Refer to the IRP, Section 7, page 106.

a. Explain whether the Encompass model was allowed to retire the Green units at any time over the forecast horizon. If not, explain why not.

b. Explain whether the EnCompass model was allowed to retire the Reid combustion Turbine at any time over the forecast horizon. If not, explain why not.

c. Explain whether the Encompass model, if allowed, would have retired the Wilson unit at any time over the forecast horizon.

15. Refer to the IRP, Section 5, page 106. Provide ranges for all inputs referred to on page 106.

16. Refer to the IRP, Section 7, page 107. Explain the fuel type for the Wartsila reciprocating engine.

17. Refer to the IRP, page 107. Explain how BREC decided what generation resources to include as plan options.

18. Refer to the IRP, Section 7, page 108. If the EnCompass Model results included in this IRP do not represent a commitment by BREC to a specific course of

action, given the time and effort it took to generate the IRP, explain what the analysis results do represent, especially in the near term.

19. Refer to the IRP, Section 7, page 108. Regarding the Single Variable Analysis, explain whether BREC allowed the model to run with two variables changing as opposed to single variables. If so, explain and provide the analysis results.

20. Refer to the IRP, page 108. Provide ranges for all sensitivities referenced on page 108.

21. Refer to the IRP, Section 7, Figure 7.1.2(a), page 110.

a. The figure shows that the Non-Member sales stop in 2028. Explain whether BREC intends to pursue contract renewal.

b. If the Owensboro Municipal Utility (OMU) and KYMEA contracts are renewed for the same amounts of capacity and energy, explain whether BREC has sufficient capacity to satisfy MISO's seasonal resource adequacy construct.

c. Identify and explain any provisions in BREC's contracts with OMU and KYMEA that address the ability of BREC, OMU, or KYMEA to renew the contracts, including any guaranteed right of renewal under specific circumstances.

22. Refer to the IRP, Section 7, Figure 7.1.2(b), page 111. Explain why solar is being given capacity values during the winter in 2025 and 2026, but no other years. Include in the response the MISO accredited capacity values attributable to solar.

23. Refer to the IRP, Section 7, Figure 7.1.2(c), page 112. Explain the reasons for coal generation declining through 2029 and then recovering to near 2024 levels.

24. Refer to the IRP, Section 7, Figure 7.1.2(a), page 110; and Figure 7.1.2(b), page 111.

a. Provide the data represented in the figures in excel format with all cells visible and unprotected broken out according to MISO's seasonal accredited capacity (SAC) values and with the associated planning reserve margin requirement (PRMR) basis.

b. Refer also to Section 2, Table 2.2.8, page 28. Net of Non-Member sales, explain and show any differences difference between BREC's Delivered Peak and BREC's coincident peak.

c. Refer also to BREC's October 27, 2023 Response to Commission Staff's First Request for Information, Item 4, Attachment PSC 1-4 in Case No. 2023-00312.³ Reconcile any differences between the information provided in the seasonally reformatted tables in part a. of this request with the table provided in Item 4.

25. Refer to the IRP, Section 7, page 113.

a. Confirm that modeling the new natural gas combined cycle (NGCC) being modeled on a capacity block basis means that each capacity block represents a different sized combined cycle unit made available to the model. If not, explain what the different blocks represent.

b. Refer also to the IRP, Section 7, page 116. Explain how the new 635 MW NGCC can be modeled in different capacity blocks.

26. Refer to the IRP, Section 7, page 115.

a. Explain why EnCompass was only allowed to select portfolios that retired the two Green units in 2029 and replaced them with a 635 MW NGCC unit; or

³ Case No. 2023-00312, *Electronic Tariff Filing Of Big Rivers Electric Corporation and Kenergy Corp. To Revise The Large Industrial Customer Standby Service Tariff* (filed Sept. 1, 2023).

portfolios that continued operating the Green units for another 20 years. Include in the explanation why it is necessary for the units to be either run or retired together.

b. Explain what the modeling results would be if the Green units were allowed to be retired and replaced with the 635 MW NGCC dynamically in any year.

27. Refer to the IRP, Section 7, page 116. Provide the overnight capital costs and other relevant operating characteristics of the different technologies made available to the EnCompass model and the source of the information.

28. Refer to the IRP, Section 7, Table 7.1.4(e), page 118. Provide an update to the table to include the two Green units and the Reid unit.

29. Refer to the IRP, Section 7, page 119.

a. Explain whether the wind and solar facilities are assumed to be located in BREC's service territory. If yes, provide the underlying studies and any other support (including National Oceanographic and Atmospheric Administration (NOAA) wind studies if available) to justify locating up to 700 MW of viable wind generation in BREC's service territory.

b. Explain whether BREC is aware of any utility scale wind generation within its service territory. If so, provide the location of the facility.

c. Explain why wind and solar power purchase agreements (PPAs) were not considered as alternatives.

d. Explain whether BREC is still looking to provide solar energy to any specific industrial customers to make up for previously canceled solar projects and, if so, why this additional renewable resource was not included in the IRP.

30. Refer to the IRP, Section 7, Table 7.1.4(h), page 121.

a. Explain how the effective load carrying capability (ELCC) for solar can be 50 percent across the seasons for 2023-2025.

b. Explain how the solar ELCC can be 50 percent for fall and winter in 2025 and then only 6 percent and 1 percent respectively for 2026.

c. Refer also to the IRP, Section 7, page 120. Since BREC modeled a 100 MW solar and 50 MW 4-hour battery storage system as a paired resource, explain whether the ELCC for the pair is the same as the ELCC for the individual components.

31. Refer to the IRP, Section 7, page 130; and Table 7.1.5(a), page 131.

a. Explain the difference between the numbers in the table and the narrative description on page 130.

b. Explain whether the numbers in the table mean that the “\$/kW-season” are the same for all seasons.

c. Explain whether the (cost of new entry) CONE for Zone 6 has been constant historically. If not, explain why it is reasonable for the CONE to be held constant over the forecast horizon.

d. Explain the generation technology upon which the CONE for Zone 6 represented in Table 7.1.5(a) is based.

32. Refer to the IRP, Section 7, page 133. BREC states that all coal and natural gas fired units were modeled as economically committed. Explain whether this is the manner in which the units are always committed to the market. If not, explain the rationale for the simplifying assumption.

33. Refer to the IRP, Section 7, Table 7.1.6, page 133; and Section 2, Table 2.2.8(a). Reconcile the differences in coincident peak (CP) between the two tables.

34. Refer to the IRP, Section 7, Tables 7.2.1(a), page 135; and Table 7.2.1(b), page 136. Explain the rationale for constraining the PACE solar plus storage project (PACE Project) to be made available to the EnCompass model in year 2028 and why the model was not allowed to add additional increments in subsequent years.

35. Refer to the IRP, Section 7, Table 7.1.4(i), page 122, indicating that solar has a capital and fixed O&M cost advantage over onshore wind. Refer also to the IRP, Section 7, page 141, indicating that the EnCompass model did not select solar as an individual resource in either the Base Case or any of the scenarios listed on that page. Explain why the model never selected solar as a standalone resource.

36. Refer to the IRP, Section 7, page 140. Explain the rationale for selecting a 635 MW natural gas combined cycle unit as a potential replacement resource for the two green units that have a combined capacity of only 454 MW.

37. Refer to the IRP, Section 7, Table 7.2.3(a), page 141. Provide an update to the table showing BREC's current unit generation capacity, BREC's seasonal reserve margins currently, and BREC's expected seasonal reserve margins in each of the scenarios in the table.

38. Refer to the IRP, Table 7.2.3(a), page 141.

- a. State why DSM Program is selected under some but not all scenarios.
- b. State which DSM programs are included in these scenarios.
- c. State whether demand response programs are included as part of DSM programs in these scenarios. If not, state whether they are included as a factor in load forecast.

39. Refer to the IRP, Section 7, page 120; pages 141-143; and Table 7.4.1(b), page 153.

a. Even though the PACE Project was considered uneconomic in most initial resource assessment portfolio scenarios, explain why the PACE Project was not included as an already completed project in the resource selection modeling since BREC's analysis appears to show that it intends to move ahead with the project.

b. Confirm that BREC intends to construct, own, maintain and operate the PACE Project.

c. Explain how the PACE Project will reduce transmission congestion and provide increased resilience along the MISO/TVA seam.

40. Refer to the IRP, Section 7, page 120 and pages 142-143.

a. Explain when BREC submitted the request to study the PACE Project to MISO.

b. Explain when BREC submitted its application for the full \$100 million loan amount for the PACE Project and the current status of the loan application. Include in the response a copy of BREC's loan application.

41. Refer to the IRP, Section 7, Table 7.2.3(a), page 141. Refer also to the IRP, Appendix A, page 54.

a. Explain whether the Low Load and High Load scenarios presented in Table 7.2.3(a) are consistent with the Low economic growth with normal weather and High economic growth with normal weather load forecast scenarios in the Appendix. If not, explain why not.

b. Explain whether the Encompass model consistently selected the retirement of both Green units because their current depreciation schedule has them fully depreciated in 2029. Include in the response whether the model will continue to operate a unit that is fully depreciated and, if so, under what circumstances.

c. Explain whether the modeling option to let the Green units and the Reid unit run for an additional 20 years necessitated altering the depreciation schedules accordingly.

42. Refer to the IRP, Section 7, pages 144. Explain why the Wilson and new NGCC units are retrofitted with CCS technology and not the Reid CT.

43. Refer to the IRP, Section 7, pages 145. Explain why the Wilson unit and not the new NGCC unit is eligible for financing and grant incentives.

44. Refer to the IRP, Section 7, pages 145.

a. Explain the rationale and basis for the carbon transportation and storage costs.

b. Explain the basis for the 45Q tax credits.

45. Refer to the IRP, Section 7, Table 7.3.1(a), page 143; and Table 7.3.2(a) page 146. Given the capacity penalty of carbon capture and that the optimal operation hours and characteristics (economic dispatch) of the Wilson and NGCC units versus the additional wind resources do not match, explain how the wind resources fully compensate for the loss of capacity due to carbon capture, especially when BREC's load is near or at seasonal coincident peaks.

46. Refer to the IRP, Section 7, Figure 7.4.1(a), page 150. Provide BREC's Base Case capacity position for all four seasons including each generation technology in excel format with all cells visible and unprotected.

47. Refer to the IRP, Section 7, Figure 7.4.1(a), page 150; and Figure 7.4.1(b), page 151.

a. Explain the reasons for the increase in coal generation capacity from 2026 to 2027 and then again from 2029 to 2030, where it remains constant for the rest of the forecast horizon.

b. Confirm that the dotted line represents BREC's modeled peak plus its MISO PRMR.

c. Explain why it is reasonable to model and plan to maintain up to 400 MW of excess capacity in the summer and 228 MW of excess capacity in the winter.

48. Refer to the IRP, Section 7, Table 7.4.1(a), page 152. To the extent BREC's non-member load applies to its MISO PRMR, explain whether that load is included in BREC's capacity position. If not and MISO considers that load should be counted toward BREC's PRMR, then update the table to show both BREC's capacity position with and without non-Member load.

49. Refer to the IRP, Section 7, page 133; and Table 7.4.1(a), page 152.

a. Explain whether the table represents BREC's forecast PRMR net of its seasonal MISO PRMR.

b. Explain the implications of the new seasonal PRMR. For example, BREC is below the seasonal PRMR for two seasons, explain what short term and long term actions, if any, would MISO require BREC to take.

50. Refer to IRP, Table 7.4.1(a), page 152. State how BREC plans to address the capacity shortfall relative to MISO reserve margins for the summers of 2025 and 2026 and the winters of 2024 through 2027.

51. Refer to the IRP, Section 7, Table 7.4.1(b), page 153. Provide an update to the table showing the seasonal capacity by fuel type on the same basis as would be used to satisfy BREC's MISO PRMR. If not provided elsewhere, also provide the corresponding ELCC values.

52. Refer to the IRP, Section 7, page 156, in which BREC states that it does not consider wind to be economically feasible, because there were no wind resources proposed in its recent all source RFP; the intermittent operation of wind remote to BREC's load brings the risk of congestion costs which are hard to quantify or hedge; and some hours are extremely long at times of low market prices and others are short when prices are high. Refer also to the IRP, Section 7, page 125, indicating that BREC omitted certain other potential generation resources from the analysis on the basis of high cost and market readiness but indicating that wind was included to retest BREC's 2020 IRP wind-related assumptions.

a. Further explain BREC's reasoning for the inclusion of wind resources at any stage in the IRP modeling.

b. In all stages of the IRP modeling and analysis, explain the value of any portfolio that relies upon wind to provide capacity and/or energy.

53. Refer to the IRP, Section 7, Table 7.2.3(a), page 141; Table 7.3.1(a), page 143; and page 156.

a. All else being equal, rerun the EnCompass model allowing it to retire the Green units and to add the NGCC unit in any year, to add the PACE Project in any year and in multiple increments; and without wind generation as a potential resource option.

b. Provide and compare the subsequent results to the scenario runs presented in the IRP, Table 7.2.3 (a), page 141; and Table 7.3.1(a), page 143.

54. Refer to the IRP, Section 7, Figure 7.4.2(a), page 157; and Figure 7.4.2(b), page 158. Explain the reasons for coal generation capacity increases from 2026 to 2027 and then again from 2029 to 2030, where it remains constant for the rest of the forecast horizon.

55. Refer to the IRP, Section 7, Figure 7.4.3(a), Figure 7.4.3(b), and Figure 7.4.3(c), pages 159-161.

a. Figure 7.4.3(a) and Figure 7.4.3(b) show coal generation capacity remaining constant from 2032-2050 even though the Q45 tax credits expire in 2044. If the Wilson unit does not dispatch after 2044, explain whether the unit is considered available for MISO PRMR purposes, but not consuming coal after 2044.

b. Explain why the amount of forecasted natural gas generation does not appear to have diminished post 2032 in Figure 7.4.3(c) if the capacity factor of the NGCC unit falls by 87 percent after 2032 when the CCS technology is implemented.

56. Refer to the IRP, Appendix A, pages 13-14. Explain whether the IRP analysis is based on a 20-year or 30-year average for cooling degree days (CDD) and heating degree days (HDD).

57. Refer to the IRP, Appendix A, page 17.

a. Explain how the historical contribution of electric vehicles (EV) for Residential and General Commercial and Industrial (GCI) classes was isolated out of energy use and peak load.

b. Explain the Energy Information Administration (EIA) region which includes BREC.

c. Explain the data and variables used to obtain EIA projections.

d. Define and explain what “Percent of Daily EV Charging” represents on the graph titled *Electric Vehicle Load Shape* on page 17 of Appendix A.

58. Refer to the IRP, Appendix A, page 18.

a. Explain the distributed generation (DG) technologies that are present in BREC’s service territory for the Residential and GCI classes.

b. Define and explain what “Percent of Daily Generation” represents on the graph titled *Distributed Generation Load Shape* on page 18 of Appendix A.

c. Explain whether there is any other behind-the-meter generation that is not counted as DG. If so, explain how these amounts are included in BREC’s forecasts.

59. Refer to the IRP, Appendix A, page 25, in which BREC states that during the last 15 years of the forecast there will be a continuing decrease in the real cost of electricity.

a. Explain whether this assumes that carbon regulation technology is not implemented in 2032.

b. Explain the driving factors that contribute to the declining real cost of electricity.

60. Refer to the IRP, Appendix A, pages 49-50. To the extent that BREC is generating power for the benefit of its non-members during the time it is experiencing a system CP, explain why that portion of non-member generation should not be added to the BREC system CP.

61. Refer to the IRP, Appendix A, page 54. Explain why further scenarios were not run with low economic growth and extreme weather and high economic growth with mild weather as benchmarks.

62. Refer to the IRP, Appendix A, pages 54-59. Explain whether the Non-Member contract obligations are fixed, such that regardless of economic or weather variations, BREC's obligations in terms of capacity and energy do not change.

63. Refer to the IRP, Appendix A, pages 96-107. Confirm that the monthly variables January through December are binary variables used across the various regressions.

64. Refer to the IRP, Appendix A, pages 97-98.

a. Define and explain the January 1999-July 2015 variable.

b. Define and explain the 2019 Forward variable.

65. Refer to the IRP, Appendix A, page 99. Define and explain the April Cold Peaking, April Hot Peaking, October Cold Peaking and October Hot Peaking variables. Include in the response whether the variables are defined similarly for all three Distribution Members.

66. Refer to the IRP, Appendix A, page 100.

a. Explain the source of the AC saturation and the Electric Heat Saturation variables.

b. Define and explain the Residential Price and Alternative fuel Price variables. Include in the response whether the variables are defined similarly for all three Distribution Members.

67. Refer to the IRP, Appendix A, pages 101-102. Define and explain the October 2019 Forward variable.

68. Refer to the IRP, Appendix A, page 102. Define and explain the C&I Electricity Price. Include in the response whether the variables are defined similarly for all three Distribution Members.

69. Refer to the IRP, Appendix A, page 106. Define and explain the 2013 Forward and the 2015 Forward variables.



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DATED DEC 08 2023

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