

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION BY THE)	
PUBLIC SERVICE COMMISSION OF THE)	
ENVIRONMENTAL SURCHARGE MECHANISM)	
OF BIG RIVERS ELECTRIC CORPORATION FOR)	
THE SIX-MONTH BILLING PERIODS ENDING)	
JANUARY 31, 2020, JULY 31, 2020, JANUARY)	CASE NO.
31, 2021, JANUARY 31, 2022, JULY 31, 2022,)	2023-00373
AND JANUARY 31, 2023, THE TWO-YEAR)	
BILLING PERIODS ENDING JULY 31, 2021, AND)	
JULY 31, 2023, AND THE PASS-THROUGH)	
MECHANISM OF ITS THREE MEMBER)	
DISTRIBUTION COOPERATIVES)	

COMMISSION STAFF'S SECOND 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 April 1, 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

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).

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 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 environmental surcharge (ES) filings for expense months November 2020 and December 2020, Form 2.10.

a. For the Wilson Dry Sorbent Injection (DSI) 2012 Plan, explain BREC's actions from November to December that resulted in the large increases in Gross Plant in Service and Accumulated Depreciation categories.

b. From November to December, explain the large increase in the Depreciation Expense category and why the large increase does not carry forward to subsequent months.

2. Refer to BREC's ES filings for the expense month May 2021, Form 2.10. for the Green DSI project (2012 Plan). Explain why there is no Net Plant in Service value for this expense month.

3. The Commission has no record of having received BREC's ES filing for the expense month February 2022. Provide a copy of BREC's ES filings for expense month February 2022.

4. Refer to BREC's ES filings for expense months November 2022 and December 2022, Form 1.10. Explain the why the Rate of Return on Environmental Compliance Rate Base (RORORB) increases significantly from November to December.

5. Refer to BREC's ES filings for expense months August 2021 and September 2021, Form 2.00.

a. For the Determination of Environmental Compliance Rate Base (RB), explain the reasons for the significant increase of Inventory-Emission Allowances from August to September.

b. For the Determination of Pollution Control Operating Expenses (OE), explain the reasons for the significant increase of Monthly Emission Allowance Expense.

6. Refer to BREC's ES filings for expense month March 2022, Form 2.00. For the RB, explain the reasons for the significant increase in Inventory-Emission Allowances.

7. Refer to BREC's ES filings for expense month May 2022, Form 2.00. For the OE, explain the reasons for the significant increase of Monthly Emission Allowance Expense.



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Public Service Commission
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DATED MAR 18 2024

cc: Parties of Record

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