

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|--|---|------------|
| AN EXAMINATION OF THE APPLICATION OF |) | |
| THE FUEL ADJUSTMENT CLAUSE OF BIG |) | CASE NO. |
| RIVERS ELECTRIC CORPORATION FROM |) | 2025-00078 |
| NOVEMBER 1, 2023 THROUGH APRIL 30, 2024. |) | |

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 July 18, 2025. 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 response to Commission Staff's First Request for Information (Staff's First Request), Item 3.

- a. Explain the meaning of "Duration (In Days)" and how that is calculated.

b. If BREC's target Supply Inventory is 30-60 days and the actual coal inventory exceeded the target inventory by ten days, explain how BREC arrived at ten days above target when it calculated 218 days' supply.

2. Refer to BREC's response to Staff's First Request, Item 7.

a. Explain whether BREC has considered adding dual fuel capability to its combustion turbines (CTs).

b. To the extent that the interstate gas pipelines had trouble delivering gas to BREC's CT's, explain whether the pipeline issues were resolved and whether BREC is satisfied that the issues have been resolved sufficiently.

3. Refer to BREC's response to Staff's First Request, Item 15, Attachment. For the Green Station Unit #2, explain the meaning of "Differential expansion of turbine."

4. Refer to BREC's response to Staff's First Request, Item 17, Attachment.

a. Confirm that BREC does not purchase firm gas pipeline transportation for its Reid and Green units. If not confirmed, explain the response.

b. During the review period, except for the short period when Texas Gas experienced problems during the winter storm, explain whether there were any instances when BREC could purchase gas but could not purchase sufficient transportation capacity to the city gate.

c. In terms of unit availability, explain if MISO treats BREC's gas units as available if there is not sufficient pipeline capacity to transport purchased gas to the city gate.

d. Explain whether BREC purchases pipeline capacity the day ahead in the same way it purchases spot gas. If not, explain how the purchases of the gas commodity and pipeline transportation capacity are coordinated.

5. Refer to BREC's response to Staff's First Request, Item 16, Attachment, Tab Form B FuelBurned 11.2023.

a. Explain the difference between Gross KWH and True NET KWH.

b. Confirm that row 13 Gas Turbine refers to the Reid Unit. If not, explain which unit row 13 references.

c. For row 13 Gas Turbine, explain whether 115,580 kWh or 26,710 kWh was actually transmitted into the MISO energy market.

d. Also, refer also to BREC's response to Staff's First Request, Item 15. For the 77.20 hours that the Wilson Station Unit #1 was in forced outage status, explain whether the \$265.191 per MWh high-cost unit calculation was applied to the energy purchased as a result of the Wilson unit's forced outage.

e. Explain the economic reasons that over the review period, the Reid and Green units were hardly dispatched in the MISO energy market. Include in the response how these units are being bid into the day ahead energy market, i.e., must run, economic, etc.

6. Refer to BREC's Fuel Adjustment Clause (FAC) form B filing for the expense month of November 2023,² page 1 of 18, footnote 1.

a. Explain in detail the "barge repair invoices" mentioned.

² BREC's FAC Form B filing, (filed Jan. 8, 2024), for the expense month of November 2023. Generator FAC Form B filings (Supplemental Files) are located on the Kentucky Public Service Commission's website at <https://psc.ky.gov/WebNet/FuelContracts>

b. Provide the invoices that are referenced in the footnote.

7. Refer to BREC's FAC Form B filing for the expense month of November 2023, pages 7 through 9 of 18. Provide a version in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible. Any White-text tags³ that exist on the document but are obscured by white text on the white background should be identified and the purpose of those values should be clearly stated.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JUL 03 2025

cc: Parties of Record

³ "White-text tags" refers to the practice of inserting hidden keywords or instructions into a document using white font on a white background. The information is invisible to the human eye but readable by computers or automated systems.

*Big Rivers Electric Corporation
710 West 2nd Street
P. O. Box 20015
Owensboro, KY 42304