

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

RECEIVED

In the Matter of:

FEB 28 2008

**PUBLIC SERVICE
COMMISSION**

**THE APPLICATIONS OF BIG RIVERS)
ELECTRIC CORPORATION FOR:)
(I) APPROVAL OF WHOLESALE TARIFF)
ADDITIONS FOR BIG RIVERS ELECTRIC)
CORPORATIONS, (II) APPROVAL OF) CASE NO. 2007-00455
TRANSACTIONS. (III) APPROVAL TO ISSUE)
EVIDENCES OF INDEBTEDNESS, AND)
(IV) APPROVAL OF AMENDMENTS TO)
CONTRACTS; AND)

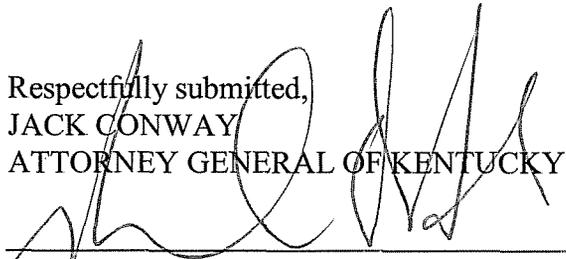
OF E.ON U.S., LLC, WESTERN KENTUCKY)
ENERGY CORP. AND LG&E ENERGY MARKETING,)
INC. FOR APPROVAL OF TRANSACTIONS)**

**ADDENDUM TO ATTORNEY GENERAL'S SUPPLEMENTAL REQUESTS FOR
INFORMATION TO JOINT APPLICANTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits his Addendum to his Supplemental Requests for Information to Big Rivers Electric Corporation ("Big Rivers"), E.ON U.S., LLC (E.ON), Western Kentucky Energy Corporation (WKEC) and LG&E Energy Marketing, Inc. (LEM) (hereinafter collectively referred to as the "Joint Applicants") and states that due to errors in copying that pages 18 and 19 were inadvertently left off. These questions are to be answered in

accordance with the terms and conditions previously outlined in the Attorney General's Supplemental Requests for Information.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL OF KENTUCKY



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CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 28th day of February, 2008, I have filed the original and ten copies of the foregoing Attorney General's Addendum to Supplemental Requests for Information to Member Cooperatives with the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

C. William Blackburn
Big Rivers Electric Corporation
P. O. Box 24
Henderson, KY 42420

David Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

Honorable John N. Hughes
124 West Todd Street
Frankfort, KY 40601

Honorable Frank N. King, Jr.
Dorsey, King, Gray, Norment & Hopgood
318 Second Street
Henderson, KY 42420

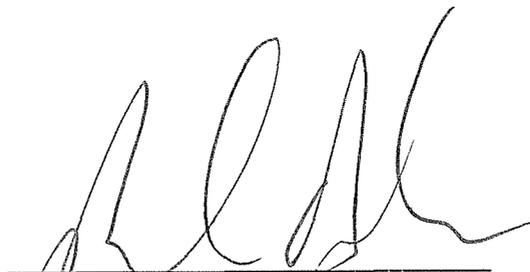
Honorable Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street Suite 1510
Cincinnati, OH 45202

Honorable James M. Miller
Sullivan, Mountjoy, Stainback & Miller, PSC
P.O. Box 727
Owensboro, KY 42302-0727

Honorable Kendrick R. Riggs
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

Honorable Allyson K. Sturgeon
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, KY 40202

Honorable Melissa D. Yates
Denton & Keuler, LLP
P.O. Box 929
Paducah, KY 42002-0929



Assistant Attorney General

- a. Does the Big Rivers/Kenergy contract proposal contain proposed rates above or equal to the large industrial class figures reflected in the Unwind Model?
 - b. At what point in time does Big Rivers/Kenergy expect agreement to be reached with Southwire?
116. Please refer to the response to OAG #5. Outside of a desire to have financing alternatives, identify and explain each and every other condition or circumstance that is contributing to Big Rivers' exploration of the indicated alternative long-term financing scenario, e.g., difficulties in obtaining previously planned financing, unfavorable credit market conditions, etc.
117. Please refer to the response to OAG #1, regarding "continuing disputes" with E.ON. Provide a description of the subject matter of each such dispute, and the approximate time of the dispute.
118. Please refer to the response to OAG #18, which attachment is dated April 25, 2007.
- a. Provide any documents or analysis from Goldman Sachs (or other investment banking advisors) subsequent to that date whose topics include deterioration of credit market conditions related to sub-prime mortgage and other developments.
 - b. Update the table on page 5 to reflect current credit market conditions.
119. Please refer to the response to OAG #41. Provide a summary of outcomes and action steps and associated timelines/milestones from the "scheduled meetings".
120. Please refer to Big Rivers' PowerPoint presentation, "Discussion of Unwind Financial Model" dated January 2008. Please update this presentation to incorporate revised data from the 2.14.08 version of the Unwind Model as provided to the parties, where the newer version changes the data in the original presentation.
121. Please refer to Sections 9.2.1 [REDACTED]
[REDACTED]
- a. Please provide documents [REDACTED]
[REDACTED]
 - b. For the table [REDACTED]
[REDACTED]

122. Please refer to the response to OAG #43, where it states “Here are some examples of possible issues that could cause the need for more funds: 1. Major Capital Expenditures as defined in the Lease Agreement.”
- a. Identify and quantify the estimated capital cost to E.ON, and Big Rivers’ estimated share of that capital cost under the Lease Agreement, by year through 2017, for each such referenced “Major Capital Expenditure as defined in the Lease Agreement”.
 - b. Provide documents which show Big Rivers’ Members’ contributions to Big Rivers’ capital investment over the past three years, over and above retained margins or patronage capital.
123. Please refer to the response to OAG #43, where it states “Current unresolved issues with E.ON already exist.”
- a. Identify and describe each such unresolved issue with E.ON.
 - b. Provide documents which show the financial impacts to Big Rivers of each such unresolved issue.
124. Please refer to the response to OAG #45. Please provide the complete set of Base Power Rate Adjustment calculations performed per the Agreement prior to February 1, 2004, the resulting indicated adjustments.