

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

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)

ATTORNEY GENERAL'S SUPPLEMENTAL REQUEST FOR INFORMATION TO
ALCAN PRIMARY PRODUCTS CORPORATION AND CENTURY ALUMINUM OF
KENTUCKY

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Supplemental Request for Information to Alcan Primary Products Corporation (Alcan) and Century Aluminum of Kentucky ("Century"), General Partnership ("Alcan/Century") to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

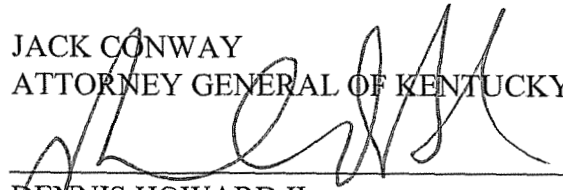
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL OF KENTUCKY

A handwritten signature in black ink, appearing to read "Dennis Howard II", is written over a horizontal line.

DENNIS HOWARD II
PAUL D. ADAMS
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CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 24th day of October, 2008, I have filed the original and ten copies of the foregoing Attorney General's Supplemental Request for Information to Alcan Primary Products Corporation and Century Aluminum of Kentucky, General Partnership ("Alcan/Century") 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:

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

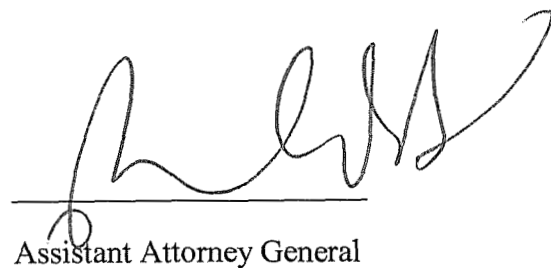
Honorable Frank N. King, Jr.
Dorsey, King, Gray, Norment & Hopgood
318 Second Street
Henderson, KY 42420

Honorable Michael L. Kurtz
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Honorable Allyson K. Sturgeon
E.ON U.S. Services, Inc.
220 West Main Street
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Assistant Attorney General

ATTORNEY GENERAL'S SUPPLEMENTAL REQUEST FOR INFORMATION
Case No. 2007-00455

1. Please update responses to all previous data requests from the Office of Attorney General with any additional responsive documents and information since the date of the last response to such data requests. If no update exists for a specific question, the responses indicating that fact can be grouped in a joint response.
2. Assume the Unwind Transaction is approved as proposed. State the extent to which smelting operations in Kentucky under the proposed electric service agreements can be viewed as "high cost" or "low cost" relative to other competing smelting operations in the marketplace.
 - a. Please provide quantification and analysis to support the response.
3. Assume the Unwind Transaction is approved as proposed, and also that current prices for aluminum persist for an indefinite time period. Please describe the viability of continued production at the smelting operations in Kentucky under those circumstances.
 - a. Please provide quantification and analysis to support the response.
4. Please provide current projection of aluminum prices over a 3-5 year period, and state the current price.
5. Assume the Unwind Transaction is approved as proposed. Please describe the ability of the smelters to maintain production at the smelting operations in Kentucky under current and future recessionary economic circumstances.
 - a. Please provide quantification and analysis to support the response.
6. Please state whether or not any further agreements or understandings exist between the smelters and any other party or entity regarding the proposed transaction which have not been explicitly identified or presented to the Commission which could be construed or understood as a "side deal" as that term is commonly understood. If any such "side deal" does exist, identify each one and describe it in detail.
7. Do the Smelters understand the proposed electric supply agreements to permit the rate charged to the smelters to vary to the extent the Commission later varies the Large Industrial rate? If not, please explain why not.
8. The Wall Street Journal states "Rio Tinto also plans to review production rates at its higher-cost aluminum-smelting units, although the miner said that the vast majority of its production is at the lower end of the cost curve." ("Rio Tinto Delays Sale of Assets", The Wall Street Journal, October 16, 2008.)
 - a. Assume the Unwind Transaction is approved as proposed. Please state whether the smelting operations in Kentucky may be characterized as "higher cost", or in "the vast majority ... at the lower end of the cost curve."
 - b. Please provide quantification and analysis to support the response.