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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

MAR 29 2010

In the Matter of:)
)
The Application of Big Rivers Electric Corporation)
for Approval To Transfer Functional Control)
of Its Transmission System to Midwest Independent)
Transmission System Operator, Inc.)

PUBLIC SERVICE
COMMISSION

Case No. 2010-00043

FIRST SET OF DATA REQUESTS
OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. (KIUC)
TO
MIDWEST INDEPENDENT TRANSMISSION SYSTEM OPERATOR

Kentucky Industrial Utility Customers, Inc. ("KIUC") requests the Intervenor, Midwest Independent Transmission System Operator ("MISO") to respond to the First Set of Data Requests herein.

DEFINITIONS

1. "Document(s)" is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.

2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, on a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion, whether preliminary or final, and whether or not referred to in MISO's direct testimony herein.

3. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the

person(s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.

4. "You" or "your" means the person whose filed testimony is the subject of these requests and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any request who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

5. Definitions:

"Big Rivers"- means Big Rivers Electric Corporation, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

"FERC" – means the Federal Energy Regulatory Commission.

"MCRSG" – means the Midwest Contingent Reserve Sharing Group

"MTEP: - means the Midwest Transmission Expansion Plan.

INSTRUCTIONS

6. The Requests shall be deemed continuing so as to require prompt further and supplemental production if at any time during this proceeding in the event you locate or obtain possession, custody or control of additional responsive documents.

7. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this proceeding should be provided as soon as they are completed. You are obliged to change, supplement and correct all answers to these Requests to conform to available information, including such information as it first becomes available to you after the answers hereto are served.

8. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

9. The answers should identify the person(s) supplying the information.

10. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

FIRST SET OF DATA REQUESTS

Clair Moeller

- Q.1-1 Please reference page 11 of your direct testimony. Please explain how the diversity of resources of MISO, as stated and alleged, will enable Big Rivers to reduce its energy costs. Do we understand your testimony to mean that Big Rivers will incur no transmission charges associated with its potential participation in MISO?
- Q.1-2 Please reference the top of page 13 of your testimony, which mentions the Value Proposition. Please provide Documents and Studies associated with the determination of the Value Proposition, as prepared by MISO.
- Q.1-3 Please reference lines 3 – 9 of page 15 of your direct testimony. Please explain how MISO operations that employ SCUC and SCED analysis procedures reside within or under your authority and purview?
- Q.1-4 Please reference lines 1 – 4 of page 16 of your direct testimony. Have you, your staff, or MISO conducted studies which demonstrate that congestion costs experienced historically by Big Rivers will be above congestion costs (for Big Rivers) following its potential participation in MISO? If the answer is Yes, please provide Documents and Studies, including workpapers, where this result is obtained. For such statement by you to be accurate, would it not require a backcast study of the relevant historical period, where Big Rivers' operations are simulated under the condition that Big Rivers is participating in MISO? If the answer is No, please explain how such a result would otherwise be obtained.

Q.1-5 Please state whether the FERC or any state regulatory commission has ever accepted or adopted the methodology presented on pages 22-23 of your direct testimony: Namely, that a proportion of MISO's Value Proposition, where the ratio of the entity's peak demand to MISO system peak demand is used to determine likely net benefits that a prospective MISO participant may realize if it joined MISO. If your response is Yes, please identify the proceeding, the regulatory authority that conducted such proceeding, the docket type and number of the proceeding, and the date of the resulting regulatory Order. Also provide a copy of the respective Order.

Q.1-6 Refer to page 22, lines 16-18 of your direct testimony. Has MISO ever conducted a member-specific benefit study of any entity for the purpose of quantifying the amount of costs and benefits, measured in dollars, that would be realized by an entity as a result of its membership in MISO? If your response is Yes, please provide Documents and Studies, including workpapers, of each Study:

(a) Please identify the study and provide an electronic and hard copy of such Study, with all formulas intact; and,

(b) Please include in your response whether the ratio of peak load of the specific member to aggregate peak load of all MISO participants was utilized to determine the share of overall MISO benefits to members, realized by a specific entity from its participation in MISO as a member.

Q1-7. Refer to page 34-35 of your direct testimony. Please explain and describe the ongoing financial obligation of a MISO participant to continue to fund, after it has withdrawn from the organization, (a) the cost of MTEP or (b) other MISO costs.

Q1-8. Please provide all Documents and Studies relating to the issue of "grandfathering" the following Big Rivers wholesale contracts:

(a) Kenergy Corp;

(b) Jackson Purchase Meade County;

(c) Kenergy Corp., for the benefit of Alcan Primary Products Corporation; and,

(d) Kenergy Corp., for the benefit of KIUC Aluminum of Kentucky General Partnership.

Please include in your response the rationale supporting the grandfathering determination in each case.

Q1-9. Please provide an estimate of the incremental amount, stated in dollars, that Big Rivers will be obligated to pay in each year, 2011 through 2015, based on MISO's final grandfathering decision compared to its financial obligation if all the above wholesale contracts had been grandfathered.

Q1-10. Refer to page 19, line 17 of your testimony. Please provide an explanation of the July 2010 filing date, including the following:

- (a) whether the filing date can be extended and if so, by whom and at whose initiative;
- (b) whether the filing date is likely to be extended and why; and
- (c) the status of the allocation process if the filing date is extended or not met?

Q1-11. Please provide the current MTEP operating plan and budget for each of the years 2011 through 2015 with respect to expansion of transmission facilities to the Great Plains region in order to connect wind energy sources to the MISO transmission grid. In your response, please include the following:

- (a) the projected dates or range of dates for each facility expansion;
- (b) the projected range of cost for each facility expansion;
- (c) the current stage of the approval process for each facility expansion; and,
- (d) a narrative discussion of competing positions among stakeholders within MISO about whether transmission expansion to accommodate wind facilities, generally, should be undertaken by MISO Transmission Owners (TOs), and about how the costs of such facilities should be allocated among stakeholders.

David Zwergel

Q1-12. Please refer to lines 9-10 of page 9 of your direct testimony. Please provide evidence, including Documents and Studies, that serve as a foundation for the statement "We (MISO) have operated

for more than a year under this model with excellent performance.” In your answer, please identify criteria by which performance is assessed, and explain how performance is gauged, given predefined measurement criteria.

Q1-13. Refer to page 10 of your direct testimony. Please identify and explain the “limitations” referred to on line 2 of your direct testimony.

Q1-14. Refer to page 10, lines 12 through 13 of your direct testimony. Please provide all documents and data detailing the dates, times of the day, duration in hours and level of TLRs calls that have been called by MISO or other Control Area Operator on flowgates or transmission interties to or with Big Rivers in the past five years.

Q1-15. Refer to page 12, lines 9 through 13 of your direct testimony. Please explain what differences there would be in MISO’s regional reliability planning process and planning coordination if Big Rivers was a member versus the status quo case wherein Big Rivers is not a member.

Richard Doying

Q1-16. Refer to page 14, lines 6 through 20 of your direct testimony. What was the relationship between day-ahead congestion revenue collections by MISO and day-ahead congestion obligations to FTR holders in MISO in 2006, 2007 and 2008? Were congestion revenues collected by MISO sufficient to cover the congestion payments made by FTR holders in the three years 2006, 2007 and 2008?

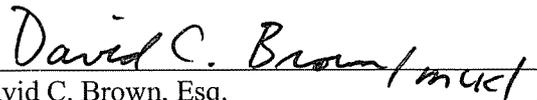
Q1-17. Refer to lines 16-22 of page 17, and lines 1-3 of page 18 of your testimony. Does the Long-Term Resource Assessment of reserves that you cite suggest that Big Rivers is likely to be able to obtain, across the region as broadly defined, contingency reserves from others over this timeframe?

- Q1-18. Refer to lines 16-21 of page 18, and lines 1-2 of page 19 of your direct testimony. Please provide Documents and Studies, including workpapers, used by MISO for the determination of the Cost of New Entry (CONE).
- Q1-19. Refer to lines 4-18 of page 19 of your direct testimony. Please provide Documents and Studies, in summary form, which detail the determination of the Loss of Load Expectation (LOLE) at a system level as determined by MISO.
- Q1-20. Refer to lines 10-12 of page 21 of your direct testimony. Please provide Documents and Studies, including workpapers, that obtain estimates of the Resource Adequacy benefits referred to as "Generator Availability Improvement." Isn't it true that, generally speaking, generator unit availability for the industry as a whole has improved over the past decade? How would one know, as a matter of causation, that the improvement in availability is attributable to unbundled reorganization of wholesale markets under MISO or attributed to other factors? Please elaborate.

Respectfully submitted,



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