

SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC

ATTORNEYS AT LAW

Ronald M. Sullivan  
Jesse T. Mountjoy  
Frank Stainback  
James M. Miller  
Michael A. Fiorella  
Allen W. Holbrook  
R. Michael Sullivan  
Bryan R. Reynolds  
Tyson A. Kamuf  
Mark W. Starnes  
C. Ellsworth Mountjoy  
Mary L. Moorhouse

March 5, 2012

**Via Federal Express**

Jeff DeRouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard, P.O. Box 615  
Frankfort, Kentucky 40602-0615

RECEIVED

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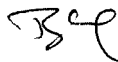
PUBLIC SERVICE  
COMMISSION

Re: In the Matter of: An Examination of the Application of the Fuel  
Adjustment Clause of Big Rivers Electric Corporation from May 1,  
2011 Through October 31, 2011, Public Service Commission,  
Case No. 2011-00487

Dear Mr. DeRouen:

Enclosed on behalf of Big Rivers Electric Corporation are an original and ten copies of  
Big Rivers' motion to withdraw exhibit and to substitute exhibit in this matter.

Sincerely,



Tyson Kamuf

TAK/ej  
Enclosures

cc: Albert Yockey  
Roger Hickman

Telephone (270) 926-4000  
Telecopier (270) 683-6694

100 St. Ann Building  
PO Box 727  
Owensboro, Kentucky  
42302-0727

1 COMMONWEALTH OF KENTUCKY  
2 BEFORE THE PUBLIC SERVICE COMMISSION  
3  
4

5 In the Matter of:  
6

7 AN EXAMINATION OF THE APPLICATION )  
8 OF THE FUEL ADJUSTMENT CLAUSE OF )  
9 BIG RIVERS ELECTRIC CORPORATION ) CASE NO. 2011-00487  
10 FROM MAY 1, 2011 THROUGH )  
11 OCTOBER 31, 2011 )  
12  
13

14 **MOTION OF BIG RIVERS ELECTRIC CORPORATION TO WITHDRAW EXHIBIT**  
15 **AND TO SUBSTITUTE EXHIBIT**  
16

17 1. Big Rivers Electric Corporation ("Big Rivers") hereby moves the Kentucky  
18 Public Service Commission ("Commission") to allow Big Rivers to withdraw an exhibit that Big  
19 Rivers filed under a petition for confidential treatment (the "Confidential Exhibit") and to  
20 substitute the attached exhibit (the "Public Exhibit") in its place.

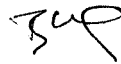
21 2. The Confidential Exhibit Big Rivers seeks to withdraw is a list of firm purchases  
22 and sales that Big Rivers filed under a petition for confidential treatment as an exhibit to Big  
23 Rivers' response to Item 5 of the information requested in the Commission's January 26, 2012,  
24 Order in this matter. Big Rivers asserted, and continues to maintain, that certain information in  
25 the Confidential Exhibit should be afforded confidential treatment under 807 KAR 5:001 Section  
26 7. Nonetheless, confidential treatment of the Confidential Exhibit was denied by letter from  
27 Commission Staff dated February 29, 2012.

28 3. Big Rivers requests to withdraw the Confidential Exhibit from the record and to  
29 substitute the Public Exhibit in its place. The Public Exhibit contains information that is fully  
30 responsive to Item 5 of the information requested in the Commission's January 26, 2012, Order,  
31 but it deletes other information that Big Rivers considers confidential and proprietary for

1 purposes of its business. This request is reasonable because it allows the Commission to have  
2 the information it desires, but it avoids the unnecessary disclosure of other information that Big  
3 Rivers considers confidential.

4 WHEREFORE, Big Rivers respectfully requests that the Commission allow Big Rivers to  
5 withdraw the Confidential Exhibit and to substitute the Public Exhibit in its place.

6 On this the 5<sup>th</sup> day of March, 2012.

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8 \_\_\_\_\_  
9 James M. Miller  
10 Tyson Kamuf  
11 Sullivan, Mountjoy, Stainback  
12 & Miller, P.S.C.  
13 100 St. Ann Street  
14 P.O. Box 727  
15 Owensboro, Kentucky 42302-0727  
16 (270) 926-4000

17  
18 COUNSEL FOR BIG RIVERS  
19 ELECTRIC CORPORATION

**Big Rivers Electric Corporation**  
**Firm Purchases/Sales**  
**May 1, 2011 through October 31, 2011**

	Buy/Sell	Utility	MW	Purpose
1	Buy	Union Electric Company d/b/a Ameren Missouri	50	Back-2-Back
2	Buy	American Electric Power Service Corporation	50	Back-2-Back
3	Buy	American Electric Power Service Corporation	102	Back-2-Back
4	Buy	American Electric Power Service Corporation	102	Back-2-Back
5	Buy	American Electric Power Service Corporation	102	Back-2-Back
6	Buy	American Electric Power Service Corporation	102	Back-2-Back
7	Buy	American Electric Power Service Corporation	52	Back-2-Back
8	Buy	Union Electric Company d/b/a Ameren Missouri	102	Back-2-Back
9	Buy	American Electric Power Service Corporation	102	Back-2-Back
10	Buy	Cargill Power Markets, LLC	100	Back-2-Back
11	Buy	American Electric Power Service Corporation	52	Back-2-Back
12	Buy	Cargill Power Markets, LLC	50	Back-2-Back
13	Buy	American Electric Power Service Corporation	102	Back-2-Back
14	Buy	American Electric Power Service Corporation	102	Back-2-Back
15	Buy	Union Electric Company d/b/a Ameren Missouri	101	Back-2-Back
16	Buy	Union Electric Company d/b/a Ameren Missouri	49	Back-2-Back
17	Buy	Cargill Power Markets, LLC	52	Back-2-Back
18	Buy	Cargill Power Markets, LLC	52	Back-2-Back
19	Buy	Cargill Power Markets, LLC	52	Back-2-Back
20	Buy	Cargill Power Markets, LLC	91	Back-2-Back
21	Buy	Cargill Power Markets, LLC	52	Back-2-Back
22	Buy	American Electric Power Service Corporation	49	Back-2-Back
23	Buy	Cargill Power Markets, LLC	52	Back-2-Back
24	Buy	Cargill Power Markets, LLC	52	Back-2-Back
25	Buy	Cargill Power Markets, LLC	52	Back-2-Back
26	Buy	Cargill Power Markets, LLC	52	Back-2-Back
27	Buy	Cargill Power Markets, LLC	52	Back-2-Back
28	Buy	Cargill Power Markets, LLC	52	Back-2-Back
29	Buy	Cargill Power Markets, LLC	52	Back-2-Back
30	Buy	Cargill Power Markets, LLC	49	Back-2-Back
31	Buy	Cargill Power Markets, LLC	52	Back-2-Back
32	Buy	Cargill Power Markets, LLC	52	Back-2-Back
33	Buy	Cargill Power Markets, LLC	52	Back-2-Back
34	Buy	Cargill Power Markets, LLC	52	Back-2-Back
35	Buy	Cargill Power Markets, LLC	49	Back-2-Back
36	Buy	Cargill Power Markets, LLC	101	Back-2-Back
37	Buy	Cargill Power Markets, LLC	52	Back-2-Back
38	Buy	EDF Trading North America, LLC	49	Back-2-Back
39	Buy	Cargill Power Markets, LLC	49	Back-2-Back
40	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
41	Sell	American Electric Power Service Corporation	50	Excess
42	Sell	Cargill Power Markets, LLC	48	Back-2-Back

**Big Rivers Electric Corporation**  
**Firm Purchases/Sales**  
**May 1, 2011 through October 31, 2011**

	Buy/Sell	Utility	MW	Purpose
43	Sell	Constellation Energy Commodities Group, Inc.	50	Excess
44	Sell	American Electric Power Service Corporation	50	Excess
45	Sell	Cargill Power Markets, LLC	50	Excess
46	Sell	Cargill Power Markets, LLC	50	Excess
47	Sell	Cargill Power Markets, LLC	50	Excess
48	Sell	Constellation Energy Commodities Group, Inc.	99	Back-2-Back
49	Sell	Constellation Energy Commodities Group, Inc.	99	Back-2-Back
50	Sell	Constellation Energy Commodities Group, Inc.	99	Back-2-Back
51	Sell	Southern Company Services, Inc.	99	Back-2-Back
52	Sell	Southern Company Services, Inc.	50	Back-2-Back
53	Sell	Cargill Power Markets, LLC	99	Back-2-Back
54	Sell	Constellation Energy Commodities Group, Inc.	99	Back-2-Back
55	Sell	Constellation Energy Commodities Group, Inc.	97	Back-2-Back
56	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
57	Sell	Southern Company Services, Inc.	48	Back-2-Back
58	Sell	Constellation Energy Commodities Group, Inc.	55	Back-2-Back
59	Sell	Southern Company Services, Inc.	44	Back-2-Back
60	Sell	Cargill Power Markets, LLC	50	Excess
61	Sell	Constellation Energy Commodities Group, Inc.	49	Back-2-Back
62	Sell	Cargill Power Markets, LLC	50	Excess
63	Sell	Cargill Power Markets, LLC	50	Excess
64	Sell	Cargill Power Markets, LLC	50	Excess
65	Sell	American Electric Power Service Corporation	50	Excess
66	Sell	American Electric Power Service Corporation	50	Excess
67	Sell	Constellation Energy Commodities Group, Inc.	48	Back-2-Back
68	Sell	EDF Trading North America, LLC	50	Back-2-Back
69	Sell	PowerSouth Energy Cooperative	48	Back-2-Back
70	Sell	EDF Trading North America, LLC	50	Back-2-Back
71	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
72	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
73	Sell	Constellation Energy Commodities Group, Inc.	88	Back-2-Back
74	Sell	American Electric Power Service Corporation	50	Excess
75	Sell	American Electric Power Service Corporation	100	Excess
76	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
77	Sell	EDF Trading North America, LLC	48	Back-2-Back
78	Sell	EDF Trading North America, LLC	50	Back-2-Back
79	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
80	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
81	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
82	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
83	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
84	Sell	EDF Trading North America, LLC	50	Back-2-Back

**Big Rivers Electric Corporation  
Firm Purchases/Sales  
May 1, 2011 through October 31, 2011**

	<b>Buy/Sell</b>	<b>Utility</b>	<b>MW</b>	<b>Purpose</b>
85	Sell	Constellation Energy Commodities Group, Inc.	48	Back-2-Back
86	Sell	EDF Trading North America, LLC	50	Back-2-Back
87	Sell	EDF Trading North America, LLC	50	Back-2-Back
88	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
89	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
90	Sell	EDF Trading North America, LLC	48	Back-2-Back
91	Sell	Constellation Energy Commodities Group, Inc.	98	Back-2-Back
92	Sell	Constellation Energy Commodities Group, Inc.	50	Back-2-Back
93	Sell	EDF Trading North America, LLC	48	Back-2-Back
94	Sell	EDF Trading North America, LLC	48	Back-2-Back