#### SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC

ATTORNEYS AT LAW

Ronald M. Sullivan
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August 31, 2012

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

Via Federal Express

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AUG 3 1 2012

**PUBLIC SERVICE** 

COMMISSION

Jeff DeRouen Executive Director Public Service Commission 211 Sower Boulevard, P.O. Box 615

211 Sower Boulevard, P.O. Box 61 Frankfort, Kentucky 40602-0615

Re: An Examination by the Public Service Commission Of the Environmental Surcharge Mechanism of

> Big Rivers Electric Corporation for the Two-Year Billing Period Ending July 31, 2011, PSC Case No. 2012-00262

Dear Mr. DeRouen:

Enclosed for filing are an original and ten copies of Big Rivers Electric Corporation's response to the Commission Staff's Second Request for Information in the above-referenced matter. Please call if you have any questions.

Sincerely,

RKI

Tyson Kamuf

TAK/ej Enclosures

cc: Albert Yockey
Ralph Ashworth
G. Kelly Nuckols
Gregory J. Starheim
Burns E. Mercer

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

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

## AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF BIG RIVERS ELECTRIC CORPORATION FOR THE TWO-YEAR BILLING PERIOD ENDING JULY 31, 2011 CASE NO. 2012-00262

#### **VERIFICATION**

I, Ralph A. Ashworth, verify, state, and affirm that the data request response filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Ralph A. Ashworth

COMMONWEALTH OF KENTUCKY )
COUNTY OF HENDERSON )

SUBSCRIBED AND SWORN TO before me by Ralph A. Ashworth on this the day of August, 2012.

Notary Public, Ky. State at Large My Commission Expires 1-12-13

### ORIGINAL



Your Touchstone Energy® Cooperative

#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

#### In the Matter of:

AN EXAMINATION BY THE PUBLIC	)	
SERVICE COMMISSION OF THE	)	
ENVIRONMENTAL SURCHARGE	)	Case No.
MECHANISM OF BIG RIVERS ELECTRIC	)	2012-00262
CORPORATION FOR THE TWO-YEAR	)	
BILLING PERIOD ENDING JULY 31, 2011	)	

Response to Commission Staff's Second Request for Information dated August 22, 2012

**FILED:** August 31, 2012

ORIGINAL

# AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF BIG RIVERS ELECTRIC CORPORATION FOR THE TWO-YEAR BILLING PERIOD ENDING JULY 31, 2011 CASE NO. 2012-00262

#### Response to Commission Staff's Second Request for Information dated August 22, 2012

#### August 31, 2012

1	Item 1) Re	fer to the response to Item 3 from Commission Staffs
2	Requests for In	nformation from the Telephonic Informal Technical
3	Conference of	August 7, 2012 ("Commission Staffs IC Request"). Starting
4	at line 15, pag	e 1 of 3, it states, :[t]he information (for non-dedicated
5	delivery point	customers) included for Jackson Purchase Energy
6		nd Meade County Rural Electric Cooperative Corporation,
7	<del></del>	nent to Big Rivers' response to Item 2 of the Commission
8		Request for Information dated July 2, 2012 (Case No. 2012-
9		to the information previously filed in Case No. 2010-00368."
10	,, 0	
11	a.	Is the information in Case No. 2012-00262 for non-
12		dedicated delivery point customers in the attachment to
13		Big Rivers' response to Item 2 from Commission Staffs
14		Initial Request for Information in agreement with the
15		schedules filed November 10, 2010 or December 10, 2010 in
16		Case No. 2010-00368?
17	<b>b</b> .	Refer to the response to Commission Staffs IC Request,
18		Item 3, page 3 of 3. It states, "[a]ttached as Exhibit E, is a
19		revised non-dedicated delivery schedule for Case No. 2011-
20		00085 reflecting the correction of the errors discussed
21		above." How did Big Rivers determine that the amounts
22		previously filed in Case No. 2011-00085 were incorrect?
23		

## AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF BIG RIVERS ELECTRIC CORPORATION FOR THE TWO-YEAR BILLING PERIOD ENDING JULY 31, 2011 CASE NO. 2012-00262

#### Response to Commission Staff's Second Request for Information dated August 22, 2012

#### August 31, 2012

1	Response) The non-dedicated delivery point schedules which Big Rivers filed on
2	July 18, 2012, in response to Item 2 of Commission Staff's Initial Request for
3	Information dated July 2, 2012, assumed that all of Big Rivers' Member
4	Cooperatives reported Environmental Surcharge information on a two-month lag
5	timetable. Following that assumption, Big Rivers filed, on August 17, 2012, the
6	revised schedules to Item 3 of the Commission Staff's Requests for Information
7	from the Telephonic Informal Technical Conference of August 7, 2012. Due to
8	turnover in accounting and finance staff responsible for these filings, current Big
9	Rivers' personnel had assumed that a two-month lag was used by all Member
10	Cooperatives in reporting this information.
11	While preparing the response to this request for information, Big
12	Rivers' finance staff discussed the Environmental Surcharge ("ES") filing process
13	with each of Big Rivers' Member Cooperatives (i.e., Jackson Purchase Energy
14	Corporation, Kenergy Corp., and Meade County Rural Electric Cooperative
15	Corporation). Based on these discussions, and review of each Member's actual
16	monthly filings, Big Rivers determined that its Members use different lag periods
17	for their respective ES filings. Jackson Purchase Energy Corporation files its
18	monthly Environmental Surcharge reports with a three-month lag, Kenergy Corp.
19	files its monthly Environmental Surcharge reports with a two-month lag, and
20	Meade County Rural Electric Cooperative Corporation files its monthly
21	Environmental Surcharge reports with a one-month lag. Therefore, Big Rivers
22	hereby attaches the non-dedicated delivery point schedules reflecting these
23	respective lag periods. These schedules align with the monthly schedules filed by

# AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF BIG RIVERS ELECTRIC CORPORATION FOR THE TWO-YEAR BILLING PERIOD ENDING JULY 31, 2011 CASE NO. 2012-00262

#### Response to Commission Staff's Second Request for Information dated August 22, 2012

#### August 31, 2012

1	the Membe	r Coc	peratives. Big Rivers also notes that these revisions in no way
2	have impac	ted t	he billings to its Member Cooperatives' Retail Members.
3			
4		a.	The information for non-dedicated delivery point customers in
5			the attachment to Big Rivers' response to Item 2 from
6			Commission Staffs Initial Request for Information dated July 2,
7			2012, agreed with the schedules filed November 10, 2010, in
8			Case No. 2010-00368.
9		b.	Please see the discussion above.
10			
11			
12	Witness)	Ral	ph A. Ashworth
13			

### BIG RIVERS ELECTRIC CORPORATION Response to Commission Staff's Information Request Dated August 22, 2012

#### Case No. 2012-00262

,	KENERGY CORP.												
$\frac{1}{2}$	ENVIRONMENTAL SURCHARGE: TWO YEAR REVIEW												
3	NON-DEDICATED DELIVERY POINT CUSTOMERS												
4	NON-DEDICATED DELIVERT FORM COSTOMERO												
5	(a)												
6		Big Rivers Electric											
7		Invoice				(Over)/Under							
8		ES Amount			ES Amount Billed	Recovery							
9		for Service	(Over)/Under	Total	to Kenergy's	(column (d) 2nd preceding							
10		Month	Recovery	Recoverable	Customers	month less column (e)							
11	Mo/Yr	(Line 13.A. per Filing)	from column (f)	column (b) + (c)	(Line 11 per Filing)	current month)							
12	Jul-09	\$ 132,656		\$ 132,656									
13	Aug-09	\$ 253,472		\$ 253,472									
14	Sept-09	\$ 187,791	\$ (10,707)	\$ 177,084	\$ 143,363	\$ (10,707)							
15	Oct-09	\$ 190,629	\$ 29,217	\$ 219,846	\$ 224,255	\$ 29,217							
16	Nov-09	\$ 168,228	\$ 11,911	\$ 180,139	\$ 165,173	\$ 11,911							
17	Dec-09	\$ 260,790	\$ (19,291)	\$ 241,499	\$ 239,137	\$ (19,291)							
18	Jan-10	\$ 262,063	\$ (45,704)	\$ 216,359	\$ 225,843	\$ (45,704)							
19	Feb-10	\$ 205,976	\$ (10,821)	\$ 195,155	\$ 252,320	\$ (10,821)							
20	Mar-10	\$ 191,619	\$ 19,648	\$ 211,267	\$ 196,711	\$ 19,648							
21	Apr-10	\$ 170,087	\$ 26,898	\$ 196,985	\$ 168,257	\$ 26,898							
22	May-10	\$ 196,406	\$ 20,428	\$ 216,834	\$ 190,839	\$ 20,428							
23	Jun-10	\$ 267,131	\$ (26,494)	\$ 240,637	\$ 223,479	\$ (26,494)							
24	Jul-10	\$ 311,711	\$ (52,576)	\$ 259,135	\$ 269,410	\$ (52,576)							
25	Aug-10	\$ 297,403	\$ (10,516)	\$ 286,887	\$ 251,153	\$ (10,516)							
26	Sep-10	\$ 214,535	\$ (8,945)	\$ 205,590	\$ 268,080	\$ (8,945)							
27	Oct-10	\$ 179,028	\$ 38,924	\$ 217,952	\$ 247,963	\$ 38,924							
28	Nov-10	\$ 246,574	\$ 22,494	\$ 269,068	\$ 183,096	\$ 22,494							
29	Dec-10	\$ 306,397	\$ (37,524)	\$ 268,873	\$ 255,476	\$ (37,524)							
30	Jan-11	\$ 268,235	\$ (82,168)	\$ 186,067	\$ 351,236	\$ (82,168)							
31	Feb-11	\$ 193,924	\$ 4,672	\$ 198,596	\$ 264,201	\$ 4,672							
32	Mar-11	\$ 188,832	\$ 24,720	\$ 213,552	\$ 161,347	\$ 24,720							
33	Apr-11	\$ 178,729	\$ 21,494	\$ 200,223	\$ 177,102	\$ 21,494							
34	May-11	\$ 153,190	\$ 20,070	\$ 173,260	\$ 193,482	\$ 20,070							
35	Jun-11	\$ 247,066	\$ (18,298)		\$ 218,521	\$ (18,298)							
36	Jul-11	\$ 285,991	\$ (33,530)	\$ 252,461	\$ 206,790	\$ (33,530)							
37	Aug-11	\$ 265,771	\$ (22,290)		\$ 251,058	\$ (22,290)							
38	Sep-11	\$ 164,119	\$ 22,335	\$ 186,454	\$ 230,126	\$ 22,335							
39	Oct-11	\$ 198,801	\$ 41,309	\$ 240,110	\$ 202,172	\$ 41,309							

### BIG RIVERS ELECTRIC CORPORATION Response to Commission Staff's Information Request Dated August 22, 2012

#### Case No. 2012-00262

1	1 JACKSON PURCHASE ENERGY CORPORATION											
2	ENVIRONMENTAL SURCHARGE: TWO YEAR REVIEW											
3	NON-DEDICATED DELIVERY POINT CUSTOMERS											
4												
5	(a)											
6		Big Rivers Electric										
7		Invoice					(Over)/Under					
8		ES Amount			Е	S Amount Billed	Recovery					
9		for Service	(Over)/Under	Total	-	to JPEC's	(column (d) 3rd preceding					
10		Month	Recovery	Recoverable	1	Customers	month less column (e)					
11	Mo/Yr	(Line 13.A. per Filing)	from column (f)	column(b) + (c)	(L	ine 11 per Filing)	current month)					
12	Jul-09	\$ 76,268	8	\$ 76,26			\$ 100 100 100 100 100 100 100 100 100 10					
13	Aug-09	\$ 145,395	\$	\$ 145,39			\$ 14 M T T T T T T T T T T T T T T T T T T					
14	Sep-09	\$ 106,638	\$	\$ 106,63			\$					
15	Oct-09	\$ 103,076	\$ 3,309	\$ 106,38		72,959	\$ 3,309					
16	Nov-09	\$ 90,752	\$ 35,246	\$ 125,99		110,149	\$ 35,246					
17	Dec-09	\$ 143,372	\$ 22,369	\$ 165,74		84,269	\$ 22,369					
18	Jan-10	\$ 140,679	\$ (28,525)			134,910	\$ (28,525)					
19	Feb-10	\$ 107,542	\$ (73,454)	\$ 34,08		199,452	\$ (73,454)					
20	Mar-10	\$ 102,962	\$ 10,071	\$ 113,03		155,670	\$ 10,071					
21	Apr-10	\$ 94,101	\$ 22,767	\$ 116,86		89,387	\$ 22,767					
22	May-10	\$ 109,912	\$ 7,630	\$ 117,54		26,458	\$ 7,630					
23	Jun-10	\$ 151,977	\$ 18,033	\$ 170,01	,	95,000	\$ 18,033					
24	Jul-10	\$ 179,949	\$ (55, 121)			171,989	\$ (55,121)					
25	Aug-10	\$ 171,248	\$ (48,940)	1 '		166,482	\$ (48,940)					
26	Sep-10	\$ 119,364	\$ (22,992)		1 '	193,002	\$ (22,992)					
27	Oct-10	\$ 99,597	\$ 14,204	\$ 113,80		110,624	\$ 14,204					
28	Nov-10	\$ 133,941	\$ 45,591	\$ 179,53		76,717	\$ 45,591					
29	Dec-10	\$ 165,291	\$ 20,234	\$ 185,52		76,138	\$ 20,234					
30	Jan-11	\$ 144,991	\$ (47,138)	4 '		160,939	\$ (47,138)					
31	Feb-11	\$ 106,243	\$ (93,277)	1 '		272,809	\$ (93,277)					
32	Mar-11	\$ 104,279	\$ 11,884	\$ 116,16		173,641	\$ 11,884					
33	Apr-11	\$ 99,503	\$ 26,736	\$ 126,23		71,117	\$ 26,736					
34	May-11	\$ 84,395	\$ 2,696	\$ 87,09		10,270	\$ 2,696					
35	Jun-11	\$ 144,106	\$ 14,433	\$ 158,53	. 1	101,730	\$ 14,433					
36	Jul-11	\$ 161,441	\$ (46,810)			173,049	\$ (46,810)					
37	Aug-11	\$ 150,142	\$ (31,635)			118,726	\$ (31,635)					
38	Sep-11	\$ 91,106	\$ (39,248)	1 '		197,787	\$ (39,248)					
39	Oct-11	\$ 108,148	\$ 29,975	\$ 138,12	3   \$	84,656	\$ 29,975					

### BIG RIVERS ELECTRIC CORPORATION Response to Commission Staff's Information Request Dated August 22, 2012

#### Case No. 2012-00262

1	1 MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION										
2	ENVIRONMENTAL SURCHARGE: TWO YEAR REVIEW										
3	NON-DEDICATED DELIVERY POINT CUSTOMERS										
4	4										
5	(a) (b) (c) (d) (e) (f)										
6		Big Rivers Electric									
7		Invoice								(Over)/Under	
8		ES Amount						ES Amount Billed		Recovery	
9		for Service	((	Over)/Under		Total		to MCRECC's		column (d)1st preceding	
10		Month		Recovery		Recoverable		Customers		month less column (e)	
11	Mo/Yr	(Line 13.A. per Filing)	ODD DODGO	om column (f)		column (b) + (c)		(Line 11 per Filing)		current month)	
12	Jul-09	\$ 47,307	8	Ψ.	\$	47,307	8			100 100 100 100 100 100 100 100 100 100	
13	Aug-09	\$ 91,992	\$	(3,960)	\$	88,032	\$	51,267	\$	(3,960)	
14	Sep-09	\$ 67,075	\$	13,732	\$	80,807	\$	74,300	\$	13,732	
15	Oct-09	\$ 73,477	\$	3,006	\$	76,483	\$	77,801	\$	3,006	
16	Nov-09	\$ 68,063	\$	(6,809)	\$	61,254	\$	83,292	\$	(6,809)	
17	Dec-09	\$ 112,332	\$	(28, 180)	\$	84,152	\$	89,434	\$	(28, 180)	
18	Jan-10	\$ 116,417	\$	(7,947)	\$	108,470	\$	92,099	\$	(7,947)	
19	Feb-10	\$ 92,559	\$	7,490	\$	100,049	\$	100,980	\$	7,490	
20	Mar-10	\$ 79,213	\$	26,869	\$	106,082	\$	73,180	\$	26,869	
21	Apr-10	\$ 65,510	\$	25,924	\$	91,434	\$	80,158	\$	25,924	
22	May-10	\$ 72,893	\$	(10,309)	\$	62,584	\$	101,743	\$	(10,309)	
23	Jun-10	\$ 98,353	\$	(22,927)	\$	75,426	\$	85,511	\$	(22,927)	
24	Jul-10	\$ 116,038	\$	(3,674)	\$	112,364	\$	79,100	\$	(3,674)	
25	Aug-10	\$ 109,272	\$	(1,359)	\$	107,913	\$	113,723	\$	(1,359)	
26	Sep-10	\$ 79,023	\$	23,879	\$	102,902	\$	84,034	\$	23,879	
27	Oct-10	\$ 69,354	\$	16,987	\$	86,341	\$	85,915	\$	16,987	
28	Nov-10	\$ 101,359	\$	(20,064)	\$	81,295	\$	106,405	\$	(20,064)	
29	Dec-10	\$ 138,048	\$	(43,982)	\$	94,066	\$	125,277	\$	(43,982)	
30	Jan-11	\$ 120,297	\$	959	\$	121,256	\$	93,107	\$	959	
31	Feb-11	\$ 83,975	\$	23,147	\$	107,122	\$	98,109	\$	23,147	
32	Mar-11	\$ 78,979	\$	19,514	\$	98,493	\$	87,608	\$	19,514	
33	Apr-11	\$ 69,631	\$	7,506	\$	77,137	\$	90,987	\$	7,506	
34	May-11	\$ 57,737	\$	(4,789)	\$	52,948	\$	81,926	\$	(4,789)	
35	Jun-11	\$ 88,908	\$	(10,893)	\$	78,015	\$	63,841	\$	(10,893)	
36	Jul-11	\$ 104,974	\$	(16,512)	\$	88,462	\$	94,527	\$	(16,512)	
37	Aug-11	\$ 96,473	\$	13,138	\$	109,611	\$	75,324	\$	13,138	
38 39	Sep-11	\$ 60,123	\$	26,053	\$	86,176	\$	83,558	\$	26,053	
39	Oct-11	\$ 76,715	\$	2,321	\$	79,036	\$	83,855	\$	2,321	