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June 21, 2013

Mr. Jeff Derouen  
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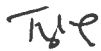
*In The Matter Of: Application of Big Rivers Electric Corporation For A  
General Adjustment In Rates - Case No. 2012-00535*

Dear Mr. Derouen:

Enclosed for filing are an original and ten (10) copies of Big Rivers Electric Corporation's updated responses to Ben Taylor and Sierra Club's Supplemental Requests for Information as required by the Public Service Commission's June 19, 2013, Order.

I certify that on this date, a copy of this letter and a copy of the updated responses were served on the persons listed on the attached service list by first class mail, postage prepaid, or by Federal Express.

Sincerely,



Tyson Kamuf

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**BIG RIVERS ELECTRIC CORPORATION**

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION  
FOR A GENERAL ADJUSTMENT IN RATES  
CASE NO. 2012-00535**


**VERIFICATION**

I, Robert W. Berry, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
Robert W. Berry

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

SUBSCRIBED AND SWORN TO before me by Robert W. Berry on this  
the 20 day of June, 2013.

  
Notary Public, Ky. State at Large  
My Commission Expires \_\_\_\_\_

**Notary Public, Kentucky State-At-Large  
My Commission Expires: July 3, 2014  
ID 421951**

**BIG RIVERS ELECTRIC CORPORATION**

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION  
FOR A GENERAL ADJUSTMENT IN RATES  
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**VERIFICATION**

I, Lindsay N. Barron, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
Lindsay N. Barron

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

SUBSCRIBED AND SWORN TO before me by Lindsay N. Barron on  
this the 01<sup>st</sup> day of June, 2013.

  
Notary Public, Ky. State at Large  
My Commission Expires 8-9-2014

**ORIGINAL**



Your Touchstone Energy® Cooperative 

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**In the Matter of:**

**APPLICATION OF BIG RIVERS                    )  
ELECTRIC CORPORATION FOR A                )    Case No. 2012-00535  
GENERAL ADJUSTMENT IN RATES            )**

**Responses to Item Nos. 2, 3, 4, 5, and 8  
of Ben Taylor and the Sierra Club's  
Supplemental Request for Information  
dated May 6, 2013**

**FILED:        June 24, 2013**

**ORIGINAL**

**BIG RIVERS ELECTRIC CORPORATION**  
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**Response to Ben Taylor and Sierra Club's**  
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**June 24, 2013**

1    **Item 2)**        *See BREC response to SC DR 1-7. "Big Rivers' operating plan consists of*  
2    *the current year budget and a three year financial plan; therefore, we can only provide*  
3    *2013 through 2016 for this request..."*

4                    *a. Does the Company do any modeling or planning beyond the three year*  
5                    *horizon?*

6                    *i. If so, describe what modeling and planning is performed beyond*  
7                    *the three year horizon, and produce the results of the most recent*  
8                    *modeling or planning run by or for the Company.*

9                    *ii. If not, describe why the Company expects that it is reasonable or*  
10                   *prudent to only review three years of forward looking costs.*

11                   *b. Does the Company run, have run on its behalf, production cost*  
12                   *modeling that extends beyond a three year horizon?*

13                   *i. If so, identify the year to which production cost modeling is*  
14                   *performed, and produce the results of the most recent production*  
15                   *cost modeling run by or for the Company.*

16                   *ii. If not, describe in detail why the Company expects that it is*  
17                   *reasonable or prudent to only review three years of forward*  
18                   *looking costs.*

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- 1           c. *If the Company only projects off system sales revenues through 2016,*  
2                   *please explain how the Company can be sure that off system sales*  
3                   *revenues will recover/improve in the future.*
- 4           d. *See BREC response to PSC 2-21(c): "Big Rivers' current long term*  
5                   *financial model indicates Wilson Station will restart in 2019."*
- 6                   i. *Please provide any and all evidence that, if idled, Wilson Station*  
7                           *will restart in 2019. If such evidence has already been provided,*  
8                           *please indicate reference to workbook.*
- 9                   ii. *Please explain how the Company is able to predict a restart in*  
10                           *2019 if its operating plan projections only go out to 2016.*

11 **Response)**   Big Rivers objects to this request on the grounds that it is overbroad, unduly  
12 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.  
13 Notwithstanding these objections, but without waiving them, please see Big Rivers' fifteen  
14 (15) year Production Cost Model ("PCM") runs for years 2013 - 2027 on the accompanying  
15 CD which has been submitted under petition for confidential treatment.

16           a. Yes

- 17                   i. Big Rivers has performed 15 year production cost model runs to  
18                           forecast when the idled unit will be cost effective to return to service.



**BIG RIVERS ELECTRIC CORPORATION**  
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1                   The production cost model runs do not include any fixed costs, only  
2                   the variable costs of operating. Please see the accompanying CD  
3                   which has been submitted under petition for confidential treatment for  
4                   the five (5), fifteen (15) year production cost model runs listed below.

- 5                               1. Base Case – All units operating, Century not operating, 4%  
6                               discount in power prices
- 7                               2. Sens. 1 – All units operating, Century operating with Big  
8                               Rivers providing power
- 9                               3. Sens. 2 – Coleman Station idled, Century not operating
- 10                              4. Sens. 3 – Wilson Station idled, Century not operating
- 11                              5. Sens. 4 – All units operating, Century operating with  
12                              market power, same power prices as Sens. 1 through Sens.  
13                              3

14                              ii. Not applicable

15           b. Yes

16                              i. Please see response to a. subpart i. above.

17                              ii. Not applicable

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- 1 c. The 15 year production cost model runs do provide projections for off system sales  
2 revenues.
- 3 d. Please see below
- 4 i. As stated in a. subpart i. above, production cost model runs only  
5 provide the variable operating costs. Fixed costs are evaluated in Big  
6 Rivers' financial model. Production cost model runs Sens. 3 – Wilson  
7 idled and Sens. 4 – All Running were evaluated in Big Rivers'  
8 financial model. Through this evaluation, it was determined Wilson  
9 would restart in 2019. Please see the accompanying CD which has  
10 been submitted under petition for confidential treatment for Big  
11 Rivers' financial model results.
- 12 ii. Please see response to d. subpart i. above.

13

14 **Witness)** Robert W. Berry

**BIG RIVERS ELECTRIC CORPORATION**  
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1 **Item 3)**        *For each of the Company's generating units, for the years 2013-2030, if the*  
2 *Company maintains any records or information for the purposes of modeling, forecasting,*  
3 *or other resource planning, please provide the following information, on an annual basis:*

- 4                    *a. Non-environmental capital expenditures,*
- 5                    *b. Capital expenditures for pollution controls,*
- 6                    *c. Generation,*
- 7                    *d. Variable operating costs,*
- 8                    *e. Fixed operating costs,*
- 9                    *f. Fuel costs,*
- 10                   *g. Heat rate,*
- 11                   *h. Capacity factor,*
- 12                   *i. EFOR, and*
- 13                   *j. Emission allowance expenditures.*

14 **Response)**    Big Rivers objects to this request on the grounds that it is overbroad, unduly  
15 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.  
16 Notwithstanding these objections, but without waiving them, please see the accompanying  
17 CD which has been submitted under petition for confidential treatment for Big Rivers'

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- 1 response to this response for years 2013 - 2027 based on its fifteen (15) year Production Cost  
2 Model ("PCM") runs. Big Rivers does not include capital expenditures or fixed operating  
3 costs in its PCM. The replies to items a, b, and e are taken from Big Rivers 2013 - 2016  
4 approved budget on which this instant filing is based.
- 5 a. Please see Big Rivers' [CONFIDENTIAL] response to SC1-25 for the 2013-2016  
6 non-environmental capital expenditure budgets.
- 7 b. Please see Big Rivers' [CONFIDENTIAL] response to SC1-25 for the 2013-2016  
8 pollution controls capital expenditure budgets.
- 9 c. Please see the accompanying CD which has been submitted under petition for  
10 confidential treatment for Big Rivers 2013-2027 unit generation. Refer to the file  
11 entitled "SC 2-3 (c,d,f-j) (Berry)(Attachment)(CONFIDENTIAL)(v 2013 05 22  
12 LVB).xlsx".
- 13 d. Please see the accompanying CD which has been submitted under petition for  
14 confidential treatment for Big Rivers 2013-2027 unit variable operating costs. Refer  
15 to the file entitled "SC 2-3 (c,d,f-j) (Berry)(Attachment)(CONFIDENTIAL)(v 2013  
16 05 22 LVB).xlsx".
- 17 e. Please see Big Rivers' [CONFIDENTIAL] response to SC1-25 for the 2013-2016  
18 fixed operating budgets.

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- 1 f. Please see the accompanying CD which has been submitted under petition for  
2 confidential treatment for Big Rivers 2013-2027 unit fuel costs. Refer to the file  
3 entitled “SC 2-3 (c,d,f-j) (Berry)(Attachment)(CONFIDENTIAL)(v 2013 05 22  
4 LVB).xlsx”.
- 5 g. Please see the accompanying CD which has been submitted under petition for  
6 confidential treatment for Big Rivers 2013-2027 unit heat rates. Refer to the file  
7 entitled “SC 2-3 (c,d,f-j) (Berry)(Attachment)(CONFIDENTIAL)(v 2013 05 22  
8 LVB).xlsx”.
- 9 h. Please see the accompanying CD which has been submitted under petition for  
10 confidential treatment for Big Rivers 2013-2027 unit net capacity factor. Refer to the  
11 file entitled “SC 2-3 (c,d,f-j) (Berry)(Attachment)(CONFIDENTIAL)(v 2013 05 22  
12 LVB).xlsx”.
- 13 i. Please see the accompanying CD which has been submitted under petition for  
14 confidential treatment for Big Rivers 2013-2027 unit EFOR. Refer to the file entitled  
15 “SC 2-3 (c,d,f-j) (Berry)(Attachment)(CONFIDENTIAL)(v 2013 05 22 LVB).xlsx”.
- 16 j. Please see the accompanying CD which has been submitted under petition for  
17 confidential treatment for Big Rivers 2013-2027 unit emission costs. Refer to the file

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1           entitled "SC 2-3 (c,d,f-j) (Berry)(Attachment)(CONFIDENTIAL)(v 2013 05 22  
2           LVB).xlsx".

3

4   **Witness)**     Robert W. Berry

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1 **Item 4)**        *See BREC response to SC 1-21(e). Please provide the ACES forecasts for*  
2 *the following variables on an annual basis for the electricity market in MISO and PJM*  
3 *(separately) from 2013-2030. Specify if in constant or nominal dollars, and dollar year.*

- 4                    *a. Capacity market prices,*  
5                    *b. On peak energy prices,*  
6                    *c. Off peak energy prices, and*  
7                    *d. Annual energy prices.*

8 **Response)**    Big Rivers objects to this request on the grounds that it is overbroad, unduly  
9 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.  
10 Notwithstanding these objections, but without waiving them, please see the accompanying  
11 CD which has been submitted under petition for confidential treatment for Big Rivers' fifteen  
12 (15) year Production Cost Models for years 2013 - 2027.

- 13                    a. No capacity price was assumed in years 2013-2027 in the production cost  
14                    models.

15

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1           b. - d. The ACES forecasted market prices for on peak and off peak energy are  
2           shown in the file entitled “SC 2-2 (Berry)(Attachment) (Big Rivers 2013-2027  
3           Budget Exhibits - Base Case)(CONFIDENTIAL)(v 11-.xlsx” on the  
4           CONFIDENTIAL CD accompanying these responses. Please refer to the tab  
5           labeled “Prices”. Big Rivers did not use PJM prices in its analysis, as Big  
6           Rivers is a MISO market participant and does not currently have transmission  
7           access to the PJM market. Big Rivers used the same forecasted market prices  
8           in all five (5) of the sensitivity model runs.  
9           The prices utilized in the production cost model are in nominal dollars.

10

11   **Witness)**     Robert W. Berry

12





**BIG RIVERS ELECTRIC CORPORATION**  
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1           b. The prices for natural gas delivered to Big Rivers are shown on the  
2           accompanying CD which is filed under petition for confidential treatment.

3           Please refer to the file entitled "SC 2-5(a-c) (Berry) (Attachment)  
4           (CONFIDENTIAL) (V 2013 05 22 LVB) .xlsx".

5           c. The prices for coal delivered to each of Big Rivers' coal fired assets are  
6           shown on the accompanying CD which is filed under petition for confidential

7           treatment. Please refer to the file entitled "SC 2-5(a-c) (Berry) (Attachment)  
8           (CONFIDENTIAL) (V 2013 05 22 LVB) .xlsx".

9           The prices utilized in the production cost models are in nominal dollars.

10

11   **Witness)**     Robert W. Berry

**BIG RIVERS ELECTRIC CORPORATION**  
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1 **Item 8)**      *For BREC as a whole, for the years 2013-2030, provide the expected or*  
2 *modeled:*

3                    *a. Contractual energy purchases from bilateral or fixed contracts in*  
4                    *MWh and dollars;*

5                    *b. Spot market energy purchases from an RTO in MWh and dollars;*

6                    *c. Contractual energy sales to internal load in MWh and dollars;*

7                    *d. Contractual energy sales to external parties in MWh and dollars;*

8                    *e. Spot market energy sales to an RTO in MWh and dollars;*

9                    *f. Please describe the scenario used to generate the above values (i.e.*  
10                    *which units are assumed in service, which smelters are assumed to*  
11                    *have contracts in force).*

12 **Response)**      Big Rivers objects to this request on the grounds that it is overbroad, unduly  
13 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.  
14 Notwithstanding these objections, but without waiving them, please see the accompanying  
15 CD which has been submitted under petition for confidential treatment for Big Rivers' fifteen  
16 (15) year Production Cost Models for years 2013 - 2027. The prices utilized in the production  
17 cost model are in nominal dollars.

**BIG RIVERS ELECTRIC CORPORATION**

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- 1 a) Contractual energy purchases are shown in the file labeled "SC 2-2  
2 (Berry) (Attachment) (Big Rivers 2013-2027 Budget Exhibits - Sens 3  
3 Sens 4 Hybrid used for Finl.xls" on the accompanying CD which has  
4 been submitted under petition for confidential treatment. Please refer  
5 to the tab labeled "Annual Sources and Uses", lines 53 and 70 labeled  
6 "SEPA" and "SEPA Demand".
- 7 b) Spot market energy purchases are shown in the file labeled "SC 2-2  
8 (Berry) (Attachment) (Big Rivers 2013-2027 Budget Exhibits - Sens 3  
9 Sens 4 Hybrid used for Finl.xls" on the accompanying CD which has  
10 been submitted under petition for confidential treatment. Please refer  
11 to the tab labeled "Annual Sources and Uses", lines 54 and 72 labeled  
12 "MKT Purchases" and "MKT".
- 13 c) Contractual Energy Sales Volumes to Internal Loads are shown in the  
14 file labeled "SC 2-2 (Berry) (Attachment) (Big Rivers 2013-2027  
15 Budget Exhibits - Sens 3 Sens 4 Hybrid used for Finl.xls" on the  
16 accompanying CD which has been submitted under petition for  
17 confidential treatment. Please refer to the tab labeled "Annual Sources  
18 and Uses", lines 59 and 60. Contractual Energy Sales Revenues to

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1 Internal Loads are shown in the file labeled “SC 2-2 (Berry) (Big  
2 Rivers Finl.xls” on the accompanying CD which has been submitted  
3 under petition for confidential treatment. Please refer to the tab labeled  
4 “Stmts RUS”, lines 193, 194, 245, and 246.

5 d) N/A

6 e) Spot market energy sales are shown in the file labeled “SC 2-2 (Berry)  
7 (Big Rivers Financial Model 2012- 2025) (CONFIDENTIAL) (v 01-  
8 31-2013)(3).xlsx” on the accompanying CD which has been submitted  
9 under petition for confidential treatment. Please refer to the tab  
10 labeled “Stmts RUS”, lines 11 and 196.

11 f) The scenarios used to generate the referenced values are identified in  
12 Big Rivers' responses to sub-parts a - e above.

13

14 **Witness)** Lindsay N. Barron

15