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

*Also Licensed in Indiana

July 1, 2013

Via Hand Delivery

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

Re: ***In the Matter of: The Application of Big Rivers Electric Corporation for a General Adjustment in Rates***, PSC Case No. 2012-00535

Dear Mr. Derouen:

Enclosed on behalf of Big Rivers Electric Corporation ("Big Rivers") are an original and ten copies of the supplemental rebuttal testimony of Robert W. Berry, Big Rivers' Motion to Strike, and Big Rivers' response to the Kentucky Industrial Utility Customer, Inc.'s motion regarding use of confidential information at the hearing. I certify that on June 29, 2013, copies of this letter and attachments were served on each of the persons on the attached service list by first class mail, postage prepaid, and by electronic mail.

Sincerely yours,

James M. Miller

JMM/ej
Enclosures

cc: Billie Richert
Service List

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

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

www.westkylaw.com

Service List
PSC Case No. 2012-00535

Jennifer B. Hans
Lawrence W. Cook
Dennis G. Howard, II
Assistant Attorneys General
1024 Capital Center Dr.
Suite 200
Frankfort, KY 40601

Mr. David Brevitz
3623 SW Woodvalley Terrace
Topeka, KS 66614

Mr. Bion C. Ostrander
1121 S.W. Chetopa Trail
Topeka, KS 66615

Mr. Larry Holloway
830 Romine Ridge
Osage City, KS 66523

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Boehm, Kurtz & Lowry
36 E. Seventh St., Suite 1510
Cincinnati, Ohio 45202

Lane Kollen
J. Kennedy and Associates, Inc.
570 Colonial Park Dr., Suite 305
Roswell, Georgia 30075

Russell L. Klepper
Energy Services Group, LLC
316 Maxwell Road, Suite 400
Alpharetta, Georgia 30009

Gregory Starheim
President & CEO
Kenergy Corp.
3111 Fairview Drive
P.O. Box 1389
Owensboro, KY 42302-1389

J. Christopher Hopgood, Esq .
318 Second Street
Henderson, Kentucky 42420

Burns Mercer
Meade County RECC
1351 Hwy. 79
P.O. Box 489
Brandenburg, Kentucky 40108

Thomas C. Brite, Esq.
Brite & Hopkins, PLLC
83 Ballpark Road
Hardinsburg, KY 40143

G. Kelly Nuckols
President and CEO
Jackson Purchase Energy Corporation
2900 Irvin Cobb Drive
P.O. Box 4030
Paducah, KY 42002-4030

Melissa D. Yates
Denton & Keuler, LLP
555 Jefferson Street
Suite 301
Paducah, KY 42001

Joe Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, Kentucky 40507

Shannon Fisk
Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 1675
Philadelphia, PA 19103

Robb Kapla
Staff Attorney
Sierra Club
85 Second Street
San Francisco, CA 94105

Sarah Jackson
Frank Ackerman
Synapse Energy Economics
485 Massachusetts Avenue, Suite 2
Cambridge, MA 02139

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

ROBERT W. BERRY
CHIEF OPERATING OFFICER

ON BEHALF OF

BIG RIVERS ELECTRIC CORPORATION

SERVED: June 29, 2013

SUPPLEMENTAL REBUTTAL TESTIMONY
OF
ROBERT W. BERRY

TABLE OF CONTENTS

SUPPLEMENTAL REBUTTAL TESTIMONY
OF
ROBERT W. BERRY

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Robert W. Berry. My business address is 201 Third Street, Henderson, Kentucky 42420.

Q. Are you the same Robert W. Berry who provided direct and rebuttal testimony in this proceeding?

A. Yes.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony in this proceeding?

A. I am testifying on behalf of Big Rivers Electric Corporation ("Big Rivers") to respond to the supplemental testimony of Sierra Club witness Frank Ackerman that was served on June 28, 2013.

III. REBUTTAL

Q. On page 1 of his supplemental testimony, Mr. Ackerman concludes that "the requested rate increase is not fair, just, and reasonable, since it forces customers to pay for maintaining unprofitable excess capacity." Do you agree?

A. No. Mr. Ackerman's conclusion is just a repeat of what he said in his direct testimony, which I refuted in my initial rebuttal testimony. In that rebuttal testimony, I explained that Coleman Station continues to be used and useful because (i) it may be required to

operate for reliability purposes, and (ii) it is an important part of Big Rivers' mitigation plan. As such, it is fair, just, and reasonable to include the fixed costs of Coleman in rates.

Q. Is Coleman required to be operated for reliability purposes?

A. As I explained on page 5 of my initial rebuttal testimony, the Midcontinent Independent System Operator, Inc. ("MISO") has identified reliability issues if Coleman Station is idled and Century continues to operate at 482 MW. This may be reduced upon further study by MISO, increasing the likelihood that MISO will require Big Rivers to continue to operate the plant. If MISO requires Big Rivers to continue to operate Coleman, it will provide system reliability benefits for Big Rivers' members, and the regional transmission system.

If MISO requires Big Rivers to operate Coleman for reliability purposes, MISO will also require Big Rivers to continue to bear the fixed costs associated with Coleman that Big Rivers would incur if Coleman were idled, such as interest, depreciation, property tax, and property insurance. Since Coleman would be necessary for the transmission system to operate reliably in this situation, it would be appropriate to continue to allow Big Rivers to recover such costs in its rates.

Q. How will Big Rivers' members benefit if Coleman is not required to be operated for reliability purposes?

A. Even if Big Rivers idles Coleman, Coleman still benefits Big Rivers' members because it is an important part of Big Rivers' mitigation plan. Mr. Ackerman thinks Big Rivers should be required to sell or retire units that are freed up by the Century contract

termination.[1] However, if Big Rivers is required to sell Coleman at fire sale prices or retire Coleman, it would be throwing away a valuable asset that is part of Big Rivers' long-term mitigation plan.

Coleman Station has many years left on its useful life. It just does not make sense to force Big Rivers to shutter Coleman, or to sell it at a fire sale, because Big Rivers would still have to pay the interest expense attributable to Coleman, yet its members would not receive the benefits of that plant. Big Rivers is actively working to maximize the value of Coleman for the benefit of its members. For example, Big Rivers and its members, in collaboration with local and state government and economic development agencies, are seeking new load for the area. New load locating in the Hawesville area will require Coleman to operate for reliability purposes if Century is operating at the Base Load, unless there are significant regional transmission upgrades to increase the transmission import capability to the area.

Big Rivers has offered Coleman for sale and would sell the plant if that would provide greater benefit to the members than idling the plant. But selling the plant at fire sale prices would not provide such a benefit.

Big Rivers is also responding to requests for proposals and negotiating with other potential purchasers of the energy from Coleman. Sierra Club claims the energy and capacity from Coleman have no value now or in the future. But even if Big Rivers is unable to find success with any of its other mitigation strategies by 2019, Big Rivers will at least be able to sell the energy from Coleman into the market. I explain later in this testimony why Big Rivers' projections showing that market prices will be sufficient in

[1] *See* Direct Testimony of Frank Ackerman at page 4, lines 19-21, and page 5, lines 20-23.

2019 to bring idled plants back on line are reasonable. Also, I provided an exhibit in my initial rebuttal testimony that shows the value of the capacity of Coleman. But the bottom line is that it makes no sense to shutter Coleman now and throw away the benefit from a valuable asset when you can instead idle the plant at a minimal cost now, maintain its value, and preserve the ability to reduce rates to members in the future.

Q. Mr. Ackerman states on Page 1 that Big Rivers does not make a compelling case for maintaining Big Rivers' existing capacity and reactivating Wilson in 2019. Does Big Rivers' financial modeling utilize the correct information from the production cost models and validate the restart of Wilson in 2019?

A. Yes. Big Rivers performed five different production cost model runs and used Sensitivity 3 (Wilson Idled) in the forecast filed with the Century rate case filing where the Wilson generating station was idled following the loss of Century load in August 2013. It was decided that based purely on economics the plant would remain idled past 2016. MISO has approved the idling of Wilson generating station through 2016, but has stated in its June 12, 2013 Attachment Y-2 Study Report, attached to my testimony as Exhibit A, that potential reliability issues were identified starting in 2017. For longer term forecasting Big Rivers' utilized Sensitivity 4 (All Running) of the production cost model runs with all units running to decide when to restart the Wilson generating station. In 2019 the off-system power market reached a level where the revenue generated by operating the plant could cover the additional fixed and variable costs related to the unit re-start and bring added value to Big Rivers' members. The financial model utilizes production cost model outputs from PCM Sensitivity 3 (Wilson Idled) through 2018 and Sensitivity 4 (All Running) for 2019 and beyond. These outputs include, but are not limited to unit

generation, unit emissions, fuel and reagent expenses and purchased power price/volumes. For modeling purposes the necessary PCM outputs from Sensitivity 4 (All Running) for 2019 and beyond were incorporated into a single data file for use by the financial model, which was referred to as the hybrid file. The outcome would be identical in this approach or if the financial model had linked separately to Sensitivity 3 (Wilson Idled) through 2018 and Sensitivity 4 (All Running) in 2019 and beyond. Additional O&M and capital expenses were added to the financial model to cover the costs to bring the plant online and operate going forward. These details were discussed in the first paragraph in the response to Shannon Fisk on June 25, 2013.

Q. Mr. Ackerman describes two other price forecasts. (Ackerman 3:14 - 4:10). Are these other two price forecasts comparable to the forecast relied upon by Big Rivers in this case?

A. No. The first forecast is one developed by Indianapolis Power & Light ("IPL") based on forecasts from the consulting firm Ventyx and included in a filing before the Indiana Utility Regulatory Commission ("IURC") initiated in August, 2012. The second is a forecast of average electricity prices to all end-users from the Energy Information Administration's ("EIA's") Annual Energy Outlook ("AEO") 2013.

Q. Why is the IPL forecast not comparable to the Big Rivers forecast?

A. The IPL forecast should not be considered comparable because no information about the assumptions used in the IPL filing before the IURC is provided in this case. The cause number provided by Mr. Ackerman indicates that the forecast was used in a docket initiated in August of 2012, which would indicate that the forecast was developed prior to that date, or at least one year ago. It is not clear what the purpose of the IPL forecast was, or what assumptions about CSAPR, CAIR, MATS, natural gas prices, economic growth, plant retirements, or other market considerations were included in development

of the forecast. In short, it is impossible to tell what is and is not included in the IPL forecast referenced by Mr. Ackerman.

Q. Why is the AEO forecast not comparable to the Big Rivers forecast?

A. The AEO forecast should not be considered comparable because it is simply not a wholesale power market price forecast. The AEO prices reflect the projected end-user average pricing for electricity for the combined residential, commercial, industrial, and transportation sectors. This is very different from a projection of wholesale energy market pricing. For this reason the AEO data should be disregarded.

Q. Does the AEO forecast include the costs of complying with what Mr. Ackerman describes as "expected" future environmental regulations?

A. No. The preface to the AEO2013 report states on page (i) that

> AEO2013 projections are based generally on federal, state, and local laws and regulations in effect as of the end of September 2012. The potential impacts of pending or proposed legislation, regulations, and standards (and sections of existing legislation that require implementing regulations or funds that have not been appropriated) are not reflected in the projections (AEO2013 Preface page ii)

On page (iii), the document makes clear that the reference case includes the reinstatement of CAIR after the court's announcement of intent to vacate CSAPR. The reference case does not include a cost associated with CO2. It is noteworthy that Mr. Ackerman criticizes Big Rivers' forecast for excluding these considerations, but relies upon a forecast that also excludes these considerations. This is another reason that Mr. Ackerman's recommendations should be rejected.

Q. Why is Big Rivers' forecast superior to both the IPL and AEO forecasts?

A. The forecast for wholesale market prices that Big Rivers relies upon in this filing is more reliable than either the IPL or the AEO forecast. The ACES forecast was developed by an organization that is directly involved in the Midwest power markets and was produced in a timeframe consistent with the instant filing. The ACES forecast is representative of

transactions that may actually take place in the Midwest energy marketplace and takes into consideration all of the information that is available to market participants.

Q. Why do the wholesale market prices in the forecast used by Big Rivers increase in 2019?

A. I expect that the projected market prices increase in 2019 primarily due to planned or announced plant retirements and the impact of those retirements upon the total generating capacity in the region. It is my understanding that such retirements stem from the MATS rule and the economics related to compliance with that rule.

Q. Do the increased market prices in 2019 exaggerate the value of Big Rivers' existing plants to ratepayers?

A. No. Because Big Rivers does include the costs of MATS compliance in its forecast, and because the market prices are expected to climb in 2019 due to plant retirements related to MATS compliance, the claim that Big Rivers is exaggerating the value of its existing plants to ratepayers is false and should be dismissed.

Q. Mr. Ackerman states that "the rate increase requested in this case is based, in part, on a projected need to spend roughly $60 million on compliance with the MATS (mercury and air toxins) rule." (Ackerman 6: 10-12). Is this correct?

A. No. The rate increase in this case is not based in part on the approximately $60 million MATS expenditures. Those expenditures are included in the Environmental Surcharge mechanism and were adjusted out of the revenue requirements calculation, as shown in Exhibit Wolfram-2.3, Reference Schedule 1.02. These expenditures and interest costs on debt for that construction are recovered through the Environmental Surcharge. That expenditure and the MATS projects were approved by the Commission in Case No.

2012-00063 based upon the Commission's acceptance of a unanimous settlement agreement to which the Sierra Club was a party.

Q. Mr. Ackerman indicates that Big Rivers' calculations do not "include the full costs of compliance with current and anticipated environmental regulations." (Ackerman 2:31-32). Is it true that Big Rivers does not include costs for compliance with any existing environmental regulations?

A. No. Big Rivers does include existing environmental regulations in its analysis. Mr. Ackerman does not cite any specific regulation that is excluded. Instead, Mr. Ackerman refers only to regulations like CSAPR that have been vacated or to other potential regulations "under consideration at EPA" which "might again become relevant." The claim that Big Rivers ignores the cost of complying with existing regulations is incorrect.

Q. Mr. Ackerman's supplemental testimony, page 2, lines 21 through 35 criticizes Big Rivers' modeling assumptions. Are Mr. Ackerman's criticisms valid?

A. No. First, the prices that Ms. Wilson criticized in the 2012 ECP case were the PACE Global prices. Big Rivers does not use the PACE Global prices in this case. Next, Mr. Ackerman refers to Big Rivers ECP filing, Case No. 2012-00063 which has no relevance to this proceeding. In the 2012 ECP case Big Rivers utilized the forward price forecast from Pace Global in its modeling runs. For this proceeding Big Rivers utilized the forward price forecast from ACES and those prices do not include the impact of carbon regulations. The increase in market prices in 2019 is driven primarily by the forecasted plant closures due to MATS regulations. The assumption of plant closures due to the MATS regulation is supported by the Wood-Mackenzie and IHS Global capacity price forecast which reflect a significant increase in capacity price in 2016. The capacity price forecast was confidentially provided in Exhibit Berry Rebuttal-1.

Lastly, the 2012 ECP filing, Case No. 2012-00063 was approved by the Commission based upon the Commission's acceptance of a unanimous settlement agreement to which Sierra Club was a party.

Q. Mr. Ackerman complains on page 8 of his supplemental testimony that one of Big Rivers' model runs has "internal inconsistencies." Do you agree?

A. No. Mr. Ackerman incorrectly claims that Big Rivers' hybrid model run appears to be "internally inconsistent." Essentially, when looking at the "hybrid" production cost model file, it is the Sensitivity 3 (Wilson Idled) file except for portions of two worksheets. On the "Annual Resource Report" worksheet, rows 424-532 and on the "Annual Sources & Uses" worksheet, rows 52-74, information was copied from Sensitivity 4 (All Running) model run. The "hybrid" production cost model was created so it could be used in the financial model. The financial model file provided does have Wilson idled in September, 2013 and restarted in 2019.

Big Rivers' approach to modeling allowed a great level of sensitivity analysis. By running PCMs that showed Wilson Idled (Sens. 3) for the full planning period and Sensitivity 4 (All Running) for the full planning period, Big Rivers was afforded a greater level of flexibility in creating sensitivities around the timing, duration, and impacts of idling units. Mr. Ackerman implied that Big Rivers' modeling was lacking due to this fact; however, this approach actually benefitted Big Rivers in its analysis through increased functionality and sensitivity optionality. The worksheets Mr. Ackerman references were not updated for the hybrid model because they were not used in the financial model.

Q. In his supplemental testimony at page 8:25-26 Mr. Ackerman criticizes Big Rivers' off-system sales projections as being overly optimistic. Is this a valid statement?

A. No. As noted by Mr. Ackerman in his testimony earlier on that page, the year to which he directs his criticism is the year that Wilson is restarted. Because of Big Rivers' participation in the MISO market and the way power markets operate. Big Rivers has an automatic outlet for every megawatt of power its plants produce. Big Rivers' off-system sales increase identified by Mr. Ackerman is due almost solely to the operation of the Wilson plant. The Wilson plant has historically been a low-cost supplier of market power, thus its capacity factor for 2012 was 84.5%.

Q. Mr. Ackerman's supplemental testimony, page 10, lines 12 through 17 criticizes Big Rivers modeling assumptions regarding future environmental regulations. Do you agree that Big Rivers should have assumed any and all potential future environmental regulations?

A. No. In the fully-forecasted test period it is not practical or reasonable to include potential future environmental regulations that have not even been formulated and may not apply. It is practically impossible for anyone to make reasonably accurate assumptions regarding what potential new environmental regulations will be enacted and what the parameters will be required in the regulation. One has to look no further than the CSAPR regulation that was filed in the federal register and then later vacated. The CSAPR regulation changed significantly from the time it was proposed to the time it was actually filed in the federal register. For example, when the CSAPR regulation was first proposed Big Rivers' largest challenge was to meet the NOx limitations, however; the regulation continued to change and the final rule made SO2 compliance the largest challenge for Big

Rivers. In this proceeding Big Rivers believes it is fair just and reasonable to only consider known environmental regulations and not request a larger increase to comply with regulations that are only speculation.

IV. CONCLUSION

Q. Do you have any closing comments?

A. A practical point I think is being missed is that economics drive the decision about running, idling or restarting a unit. If the economics make restarting a plant economically advantageous to its Members, Big Rivers will do so. If not, it will not restart the idled units. These basic economics will result in decisions that are essentially in line with what Sierra Club advocates, which is only to restart the unit if it is economical.

Projecting future market prices is just that, a projection; the farther in the future the projection, the less accurate the projection will be. Big Rivers engaged ACES to provide forecasted market energy prices. ACES is a reputable firm that provides this service to many other utilities, both members and non-members. It is not Big Rivers' intention to become a merchant generator depending solely on short-term market sales. Big Rivers is a risk-adverse cooperative that exists to serve it members. Short term market sales are only mechanisms to bridge the gap between the loss of the smelter load, and the time it takes to successfully execute Big Rivers' mitigation plan. Big Rivers' mitigation plan is a multi-prong approach which includes a reduction in expenses and replacing the smelter load with a combination of new economic development and long-term purchase power agreements, augmented by short and medium term sales.

Operating an electric utility requires Big Rivers to take the long term view in its mitigation plan. As repeatedly stated, Big Rivers' goal is to maximize its Members' value. As a not-for-profit cooperative, we always have our Members' interest at heart.

While the projections of market prices submitted by Big Rivers and the Sierra Club differ, Big Rivers contends that the uncertainty that exists regarding future prices makes it even more important to give Big Rivers the time, flexibility and broad range of options to implement its mitigation plan. Sierra Club contends that Big Rivers' assets have no value. This contention is incorrect and is very narrow sighted. Big Rivers has demonstrated through low rates to its membership that its plants are very competitive in the market. Big Rivers' Coleman Station has received the Operational Excellence Award from Navigant Consulting as the top small plant coal-fired facility in the country for two consecutive years. Navigant Consulting benchmarking includes approximately 78% of all coal fired generation in the country. Big Rivers' demonstrated capacity factor also reflects that its plants are desirable in the market and their dispatch ranks among the top of plants throughout the country.

The Sierra Club would like to see Big Rivers retire useful assets. If Big Rivers adopted the Sierra Club's proposal to retire these assets, it would narrow Big Rivers' mitigation plan options and ensure that Big Rivers' Members were never able to reap any future benefits derived from the valuable assets they currently own. Sierra Club's contention that Big Rivers is harming its members by keeping these assets should be dismissed. Big Rivers' members deserve to be given the opportunity to reduce their rates in the future. Sierra Club's proposal robs Big Rivers' Members of this opportunity and is unfair to both current and future Member-owners.

Q. Does this conclude your supplemental rebuttal testimony?

A. Yes.

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 my rebuttal testimony filed with this Verification, and that this rebuttal testimony is true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.

Robert W Berry

COMMONWEALTH OF KENTUCKY
COUNTY OF DAVIESS

SUBSCRIBED AND SWORN TO before me by Robert W. Berry on this the 29 day of June, 2013.

Mary C. Johnson
Notary Public, Ky. State at Large
My Commission Expires 7/29/15
Notary ID No.: 446462

TO THE PSC AND INTERVENORS IN CASE NO. 2012-00535:

PLEASE NOTE THAT ALL CONFIDENTIAL INFORMATION HAS BEEN REDACTED FROM THIS DOCUMENT.

Attachment Y-2 Study
Wilson, Unit 1: 417 MW Coal
29 Month Suspension
8/20/2013 – 1/1/2015

ATTACHMENT Y-2 STUDY REPORT

FINAL

June 12, 2013

CONTAINS CONFIDENTIAL

INFORMATION

DO NOT RELEASE

EXECUTIVE SUMMARY

MISO received an Attachment Y - 2 Request for Non-Binding Study Regarding Potential SSR Status (Attachment Y-2 Request) from Big Rivers Electric Corporation was received on December 28th 2012. The request was to determine the reliability impact of the potential suspension of Wilson Unit 1 from August 20, 2013 to January 1, 2015. The Attachment Y-2 analysis is performed as a non-binding assessment of potential reliability issues due to the Suspension or Retirement of a Generation Resource. The results of the study are not definitive and the analysis is intended only to provide information to the Market Participant (MP) to assist them in evaluating their options. However it does not commit the Market Participant (MP) to proceed with plans for Suspension or Retirement.

The study results indicate that during the suspension period no potential transmission reliability issues were identified to require the need for a System Support Resource (SSR) contract. However beyond the requested suspension period potential reliability issues were identified starting in 2017 that suggest the unit would be needed in the future. Therefore, under Section 38.2.7 of the MISO Open Access Transmission and Energy and Operating Reserve Markets Tariff ("Tariff"), the BREC Wilson Unit 1 could be suspended from service without the need for the generator to be designated as a System Support Resource ("SSR") unit as defined in the Tariff. If BREC were to extend the suspension or retire the unit, then the issues that arise in the later years would require the unit be designated as an SSR if a mitigation plan could not be developed prior to the extension or retirement.

Contents

I. INTRODUCTION

Big Rivers Electric Corporation, submitted an Attachment Y-2 "Request for Non-Binding Study Regarding Potential SSR Status". Unlike the Attachment Y, an Attachment Y-2 Request is for an information study to evaluate the potential for a unit to be designated as an SSR and does not commit the Market Participant to proceed with plans to Retire or Suspend a generator. This study of the Wilson Generation Unit determined the reliability impacts that would occur if these units were to be removed from service on August 20, 2013 and return to service on January 1, 2015. With Wilson generation unavailable during this period of time, the study will also address the reliability impacts of two scenarios: 1) Century Aluminum ceases operation on August 19, 2013 and 2) Century Aluminum continues normal operations.

Location: Centertown, Kentucky
Number and type of generating unit(s): One Unit
Plant and unit number(s): Wilson Plant Unit #1

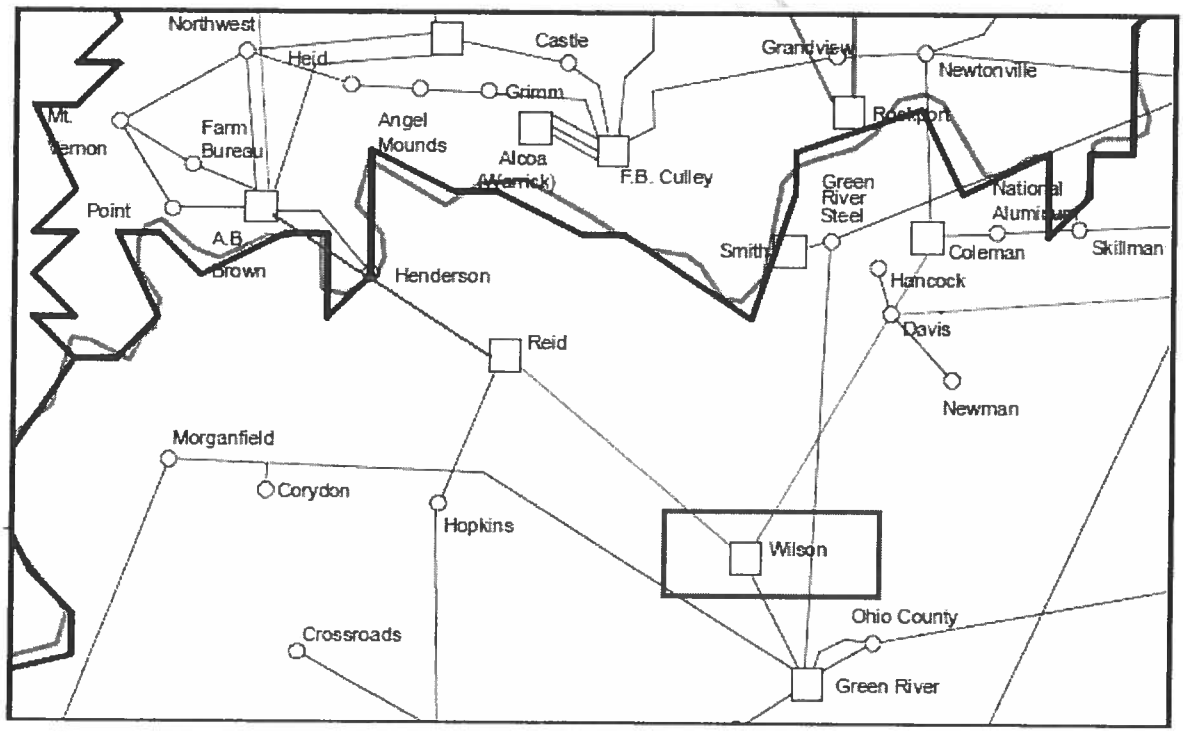

Figure 1: General Location of the Wilson Plant in Northern Kentucky

II. STUDY OBJECTIVES

Under Section 38.2.7 of the MISO Tariff, System Support Resource (SSR) procedures maintain system reliability by providing a mechanism for MISO to enter into agreements with Market Participants (MP) that own or operate Generation Resources or Synchronous Condenser Units (SCUs) that have requested to either Retire or Suspend but are required to maintain system reliability

The principal objective of and Attachment Y-2 study is to determine if the units for which a change of status is requested are necessary for system reliability based on the criteria set forth in the MISO Business Practices Manuals. The study work included monitoring and identifying the steady state thermal/voltage violations on transmission facilities due to the unavailability of the Generation Resource. The relevant MISO Transmission Owner and/or regional reliability criteria were used for monitoring such violations.

III. MODELS AND ASSUMPTIONS

Corresponding to the anticipated suspension of Wilson Unit 1, the following power system analysis source models were used for the study:

- 2014 Summer Peak
- 2017 Summer Peak
- 2017 Shoulder

The Attachment Y study models were created following the MISO Transmission Planning Business Practice Manual (BPM-020-r8) Section 6.2.2. This includes creating a set of models from each source model in which the units being studied are at full generation or taken out of service.

Model Assumptions

a. Area Generation

Coleman 1, 2, 3 online
Green 1, 2 online

b. Load Sensitivity to Century Aluminum Plant (485 MW)Transmission Projects

1. Gilbertsville 161 kV Substation The new Gilbertsville 161 kV Substation has an anticipated in-service date of September 1, 2014. This new substation will be included in the two MTEP12 2017 models since the substation will be in-service during the time Wilson Generation is unavailable.

2. LGEE / KU Matanzas 161 kV Substation The new Matanzas 161 kV Substation has an anticipated in-service date of 2013. This new substation will be included in all the models since the substation will be in-service during that time.

c. Table of Models

n	Model	Wilson 1	Century Aluminum	Contingency Categories
1	2014SP	off	off	B, C1, C2, C5
2	2014SP	off	on	B, C1, C2, C5
3	2014SP	on	off	B, C1, C2, C5
4	2014SP	on	on	B, C1, C2, C5
5	2017SH	off	off	B, C1, C2, C3, C5
6	2017SH	off	on	B, C1, C2, C3, C5
7	2017SH	on	off	B, C1, C2, C3, C5
8	2017SH	on	on	B, C1, C2, C3, C5
9	2017SP	off	off	B, C1, C2, C5
10	2017SP	off	on	B, C1, C2, C5
11	2017SP	on	off	B, C1, C2, C5
12	2017SP	on	on	B, C1, C2, C5

IV. STUDY CRITERIA AND METHODOLOGY

Siemens PTI's Power System Simulator for Engineering (PSS/E) and Managing and Utilizing System Transmission (MUST) were used to perform AC contingency analysis. Contingency analysis is the study of transmission system facility outages. Outages of transmission facilities are applied to a mathematical model of the transmission system in order to calculate the effects on the remainder of the system. The models were solved with automatic control of Load Tap Changers (LTCs), phase shifters, DC taps, switched shunts enabled (regulating), and area interchange disabled. The results are compared to determine if there were any criteria violations due to the change in the status for the unit(s).

a. Applicable Reliability Planning Criteria

MISO Transmission Owners

AMIL Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for AMIL System

- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for AMIL System

AMIL Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, all substation voltages less than 95% or above 105%
- For Category B and C contingencies, all substation voltages less than 90% or above 110%

BREC Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for BREC System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for BREC System

BREC Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, all substation voltages less than 95% or above 105%
- For Category B and C contingencies, all substation voltages less than 90% or above 110%

DEI Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for DEI System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for BREC System

DEI Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, >100 kV substation voltages less than 95% or above 105%
- For Category B and C contingencies, >100 kV substation voltages less than 90% or above 105%

HE Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for HE System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for HE System

HE Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, >100 kV substation voltages less than 95% or above 105%
- For Category B and C contingencies, >100 kV substation voltages less than 90% or above 110%

SIGE Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for SIGE System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for SIGE System

SIGE Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, >100 kV substation voltages less than 95% or above 105%
- For Category B and C contingencies, >100 kV substation voltages less than 95% or above 105%
-

SIPC Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for SIGE System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for SIGE System

SIPC Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, >100 kV substation voltages less than 91% or above 105%
- For Category B and C contingencies, >100 kV substation voltages less than 91% or above 105%

Non – MISO Transmission Owners

LGEE Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for LGEE System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for LGEE System

LGEE Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, >100 kV substation voltages less than 95% or above 105%
- For Category B and C contingencies, >100 kV substation voltages less than 90% or above 110%

TVA Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for TVA System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for TVA System

TVA Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, >100 kV substation voltages less than 95% or above 105%

- For Category B contingencies, >100 kV substation voltages less than 95% or above 110%
- For Category C contingencies, >100 kV substation voltages less than 93% or above 110%

AECI Transmission Planning Criteria applied for the thermal analysis:

- For Category A contingencies, all thermal loadings exceeding 100% of the normal rating for AECI System
- For Category B and C contingencies, all thermal loadings exceeding 100% of the emergency rating for AECI System

AECI Transmission Planning Criteria applied for the voltage analysis:

- For Category A contingencies, >100 kV substation voltages less than 95% or above 105% (
- For Category B and C contingencies, >100 kV substation voltages less than 90% or above 110%

Under category C contingencies, for the valid thermal and voltage violations as specified above, generation re-dispatch, system reconfiguration, and/or load shedding will be considered if applicable.

b. MISO Transmission Planning BPM - SSR Criteria

As specified in MISO BPM-020-r8, the System Support Resource criteria for determining if an identified facility is impacted by the generator change of status will be:

- Under system intact and contingent events, branch thermal violations are only valid if the flow increase on the element in the "after" retirement scenario is equal to or greater than:
  a) 5% of the "to-be-retired" unit(s) MW amount (i.e. 5% Power Transfer Distribution Factor (PTDF)) for a "base" violation compared with the "before" retirement scenario, or
  b) 3% of the "to-be-retired" unit(s) amount (i.e. 3% Outage Transfer Distribution Factor (OTDF)) for a "contingency" violation compared with the "before" retirement scenario.
- Under system intact and contingent events, high and low voltage violations are only valid if the change in voltage is greater than 1% as compared to the "before" retirement voltage calculation.

c. Contingencies

A subset of the MISO Transmission Expansion Plan (MTEP) contingencies in the central region were used for AC contingency analysis. Additional contingencies from TVA, LG&E, and AECI were included in this analysis to provide coverage for events on those adjacent transmission systems.

The following North American Electric Reliability Corporation (NERC) Categories of contingencies were evaluated:

1. Category A when the system is under normal conditions.
2. Category B contingencies resulting in the loss of a single element.
3. Category C contingencies resulting in the loss of two or more (multiple) elements.
4. Maintenance outage condition with forced outage during shoulder load conditions.

V. STUDY RESULTS

a. Branch Results (Appendix A Table 1a)

Table 1a in Appendix A shows contingent conditions causing branch criteria violations without Wilson Unit 1 and the improvements resulting from the operation of Wilson Unit 1. Contingent events causing branch violations include NERC Categories B, C1, C2, and C3.

The issues seen are primarily in low voltage facilities, with no branch violations in the bulk electric system (100kV and above) in the 2014 case.

b. Voltage Results (Appendix A Table 1b)

Significant voltage criteria violations associated with the suspension of Wilson Unit 1 were identified when compared to the continued availability of the unit. Table 1 in Appendix A shows contingent conditions causing criteria violations without Wilson Unit 1 and the improvements resulting from the operation of Wilson Unit 1. Contingent events causing voltage criteria violations include NERC Categories B, C1, C2, and C3. The acceptable post-contingency voltage range is between 0.92 per unit to 1.07 per unit. Therefore, voltages less than 0.92 or greater than 1.07 per unit are a criteria violation.

There are two low voltage violations in the 2014 case that are pre-existing but improve with the Wilson unit 1 suspension. A number of voltage violations appear to be caused by the suspension of the unit in the 2017 summer analysis results with few in the 2017 shoulder case.

VI. CONCLUSION

The study results indicate that during the suspension period no potential transmission reliability issues were identified to require the need for an System Support Resource (SSR) contract. However beyond the requested suspension period potential reliability issues were identified starting in 2017 that suggest the unit would be needed in the future. Therefore, under Section 38.2.7 of the MISO Open Access Transmission and Energy and Operating Reserve Markets Tariff ("Tariff"), the BREC Wilson Unit 1 could be suspended from service without the need for the generator to be designated as a System Support Resource ("SSR") unit as defined in the

Tariff. If BREC were to extend the suspension or retire the unit, then the issues that arise in the later years would require the unit be designated as an SSR if a mitigation plan could not be developed prior to the extension or retirement.

VII. APPENDICES

Appendix A: Steady-State AC Contingency Results

Table 1a: Branch Results

Table 1b: Voltage Results

Intentionally Blank

MISO Wilson 1 Attachment Y Study - Compare Branch Results

CONFIDENTIAL / REDACTED

	Contingency		Limiting Element					Wilson 1 OFF			Wilson 1 On			Unit Impact			
Model	Mcen	Contingency Description	** From bus **	** To bus **	CKT	Type	Rating	ContMW	BaseFlow	Loading %	ContMW	BaseFlow	Loading %	MWaff-MWen	PTDF (> 3%)	OTDF (> 3%)	MISO Comments
2014SP	2	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67	60.8	100.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	3	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67	60.8	100.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	16	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.5	60.8	101.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	25	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.5	60.8	101.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	26	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.5	60.8	101.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	28	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67	60.8	100.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	29	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67	60.8	100.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	72	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	68.3	60.8	102.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	31	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.4	60.8	101.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	141	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	66.9	60.8	100.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	587	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.8	60.8	101.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	588	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.9	60.8	101.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	589	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.9	60.8	101.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SP	17	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.4	60.8	101.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	16	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	66.8	59.3	100.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	249631 08THRNTH	23C 991964 THORNTWN	1.00 1	TR	69.9	87.4	48.6	125	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250310 08BRINGH	69.0 25C451 08FLORAJ	69.0 1	LN	34	37.3	3.1	109.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250321 08BURROW	69.0 25C790 08ROCKFL	69.0 1	LN	34	47.5	8.1	139.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250441 08FFWSTJ	69.0 25C457 08FRAK B	69.0 1	LN	100.3	112.1	57.9	111.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250451 08FLORAJ	69.0 25C790 08ROCKFL	69.0 1	LN	34	43.5	4.5	127.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250457 08FRAK B	69.0 25C683 08MIDLFO	69.0 1	LN	45	87	31.3	193.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250608 08KOK HP	69.0 25C610 08KOHAJ1	69.0 1	LN	45	129	10.3	286.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250608 08KOK HP	69.0 25C614 08KOSE	69.0 1	LN	65	69.7	44	107.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250610 08KOHAJ1	69.0 25C798 08RUSIAV	69.0 1	LN	45	129.5	10.3	287.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250625 08LAF	69.0 25C948 08WYMONI	69.0 1	LN	45	66.8	18	148.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250683 08MIDLFO	69.0 25C795 08ROSSVL	69.0 1	LN	44	52.6	6.1	119.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250683 08MIDLFO	69.0 25C798 08RUSIAV	69.0 1	LN	44	150	9.6	340.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250795 08ROSSVL	69.0 25C948 08WYMONI	69.0 1	LN	45	65.8	17	146.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	45	[REDACTED CONTINGENCY]	250847 08THRNTW	69.0 991964 THORNTWN	1.00 1	TR	69.9	84.2	47.1	120.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	42	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	68.5	59.3	102.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	128	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.4	59.3	101	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	129	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	67.3	59.3	101	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2014SPCentOff	144	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C229	1.00 1	TR	66.7	69.2	59.3	103.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	321	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.3	27.1	113.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	349	[REDACTED CONTINGENCY]	250366 08CNTRTN	69.0 25C400 08CPE TP	69.0 1	LN	71.7	81.5	9.4	113.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	367	[REDACTED CONTINGENCY]	249631 08THRNTH	23C 991978 THORNTWN	1.00 1	TR	69.9	84.1	48.2	120.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	367	[REDACTED CONTINGENCY]	250847 08THRNTW	69.0 991978 THORNTWN	1.00 1	TR	69.9	82.2	46.8	117.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	386	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.2	27.1	113	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	395	[REDACTED CONTINGENCY]	250830 08SPNC21	69.0 991878 SPENCER	1.00 1	TR	50.4	51	45.4	101.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	400	[REDACTED CONTINGENCY]	249834 08ROCKVL	138 25C773 08RCKVIL	69.0 1	TR	25	34.4	18.3	137.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	400	[REDACTED CONTINGENCY]	250358 08CLNTJT	69.0 25C644 08LILIAJ	69.0 1	LN	53	61	28	115.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	400	[REDACTED CONTINGENCY]	250579 08HILSDL	69.0 25C642 08LILO6J	69.0 1	LN	45	61	28	135.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	400	[REDACTED CONTINGENCY]	250695 08MONTZM	69.0 25C773 08RCKVIL	69.0 1	LN	44	50.3	18.2	114.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	401	[REDACTED CONTINGENCY]	249814 08ROCKVL	138 25C773 08RCKVIL	69.0 1	TR	25	26.9	18.3	107.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	402	[REDACTED CONTINGENCY]	250870 08WABSSC	69.0 25C874 08WABSHJ	69.0 1	LN	51	57.4	29.5	108.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	405	[REDACTED CONTINGENCY]	250803 08SALISJ	69.0 25C927 08HENSAL	69.0 1	LN	53	54.2	47.4	102.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	412	[REDACTED CONTINGENCY]	248727 07E.ENTR	69.0 248798 07FVIEW2EE	69.0 1	LN	35	37	33	105.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	412	[REDACTED CONTINGENCY]	248780 07FAIRVW	69.0 248798 07FVIEW2EE	69.0 1	LN	35	36.9	32.8	105.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	419	[REDACTED CONTINGENCY]	250830 08SPNC23	69.0 991878 SPENCER	1.00 1	TR	50.4	50.5	45.4	100.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	426	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.2	27.1	112.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	445	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	45.8	27.1	183.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	445	[REDACTED CONTINGENCY]	250487 08GRGTWN	69.0 25C927 08HENSAL	69.0 1	LN	71.7	81.7	43.3	114	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	445	[REDACTED CONTINGENCY]	250803 08SALISJ	69.0 25C927 08HENSAL	69.0 1	LN	53	86.3	47.4	162.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	446	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.4	27.1	113.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	447	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	29.2	27.1	116.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	42	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	68.8	57.2	103.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	55	[REDACTED CONTINGENCY]	324823 2CLINS81	69.0 324825 2CLNTNKU	69.0 1	LN	18	19.7	4.9	109.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	55	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	74.4	57.2	111.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	72	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	68.5	57.2	102.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	94	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.7	27.1	114.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	111	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	69.3	57.2	103.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	115	[REDACTED CONTINGENCY]	324556 2GR RVR	69.0 324709 2RQ TAP	69.0 1	LN	41	51.6	26.1	125.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	115	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0 324693 2PRINCE	69.0 1	LN	28	29	11.1	103.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	115	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0 324769 2WALKRKU	69.0 1	LN	28	28.5	10.6	101.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	115	[REDACTED CONTINGENCY]	324628 2MARI 5	69.0 324629 2MARONKU	69.0 1	LN	28	28.9	17.6	103.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	115	[REDACTED CONTINGENCY]	324644 2MORG 4	69.0 324776 2WHTC T	69.0 1	LN	18	22.2	8.3	123.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	115	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	69.5	57.2	104.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	130	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	80.7	57.2	121	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	131	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	91.2	57.2	136.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	132	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	75	57.2	112.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	133	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	75	57.2	112.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	145	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0 99C106	1.00 1	TR	66.7	82.4	57.2	123.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	158	[REDACTED CONTINGENCY]	324094 2TRTLE CRK	T69.0 324562 2HAR557	69.0 1	LN	35	39.1	15.7	112.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	335	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.2	27.1	112.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	336	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.4	27.1	113.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	337	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.4	27.1	113.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	432	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	28.3	27.1	113	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	470	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0 248808 07MAUKPT	69.0 1	LN	25	29.2	27.1	116.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension

2017SP	471	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0	248808 07MAUKPT	69.0	1	LN	25	29.7	27.1	117.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	472	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0	248808 07MAUKPT	69.0	1	LN	25	28.5	27.1	113.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324511 2ECHOLS	69.0	324584 2INDIAN	69.0	1	LN	52	80.7	9.4	155.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324511 2ECHOLS	69.0	324959 2SIMMONS	69.0	1	LN	52	79.7	8.7	153.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324548 2GIBRLT	69.0	324659 2NELSON	69.0	1	LN	52	69.5	18.5	133.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324548 2GIBRLT	69.0	326513 2EQLBREC	69.0	1	LN	52	69.5	18.5	133.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324556 2GR RVR	69.0	326513 2EQLBREC	69.0	1	LN	52	75	24	144.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324584 2INDIAN	69.0	324659 2NELSON	69.0	1	LN	52	68.4	17.4	131.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324667 2OHIO C	69.0	324703 2RIVRVI	69.0	1	LN	52	76.8	7.6	147.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	480	[REDACTED CONTINGENCY]	324703 2RIVRVI	69.0	324959 2SIMMONS	69.0	1	LN	50	78.4	8	156.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	482	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0	248808 07MAUKPT	69.0	1	LN	25	31	27.1	123.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	482	[REDACTED CONTINGENCY]	250803 08SALISJ	69.0	25C927 08HENSAL	69.0	1	LN	53	54.4	47.4	102.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	483	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0	248808 07MAUKPT	69.0	1	LN	25	25.8	27.1	103.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	484	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0	248808 07MAUKPT	69.0	1	LN	25	30.1	27.1	120.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	587	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C106	1.00	1	TR	66.7	68	57.2	101.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	588	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C106	1.00	1	TR	66.7	68.1	57.2	102.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	589	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C106	1.00	1	TR	66.7	68.1	57.2	102.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	606	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0	248808 07MAUKPT	69.0	1	LN	25	32.8	27.1	131	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	606	[REDACTED CONTINGENCY]	250803 08SALISJ	69.0	25C927 08HENSAL	69.0	1	LN	53	59.5	47.4	112.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SP	62	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	238.5	164.9	100.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SPCentOff	27	[REDACTED CONTINGENCY]	248807 07DOGWOD	69.0	248808 07MAUKPT	69.0	1	LN	25	28.5	27.4	113.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	43	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	31.1	21	111.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	49	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324693 2PRINCE	69.0	1	LN	28	30.6	18.7	109.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	49	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324769 2WALKRKU	69.0	1	LN	28	30.1	18.2	107.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	49	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	29.4	21	104.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	49	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	68.8	61.1	103.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	63	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324693 2PRINCE	69.0	1	LN	28	32.8	18.7	117	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	63	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324769 2WALKRKU	69.0	1	LN	28	32.3	18.2	115.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	63	[REDACTED CONTINGENCY]	324578 2HRDSTB	69.0	324769 2WALKRKU	69.0	1	LN	28	28.3	14.1	101.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	63	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	30.8	21	110	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	63	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	70.3	61.1	105.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	69	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	68.5	61.1	102.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	31	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	68.1	61.1	102.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	115	[REDACTED CONTINGENCY]	324486 2CRITTE	69.0	324628 2MARI S	69.0	1	LN	40	40.4	26.7	101.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	115	[REDACTED CONTINGENCY]	324578 2HRDSTB	69.0	324769 2WALKRKU	69.0	1	LN	28	32.8	14.1	117.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	115	[REDACTED CONTINGENCY]	324578 2HRDSTB	69.0	324843 2DAWSNIN	69.0	1	LN	35	35.8	16.7	102.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	115	[REDACTED CONTINGENCY]	324628 2MARONKU	69.0	324904 2MEKKU	69.0	1	LN	28	29	14.2	103.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	115	[REDACTED CONTINGENCY]	324693 2PRINCE	69.0	324747 2SUNST	69.0	1	LN	40	41.5	21.9	103.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	115	[REDACTED CONTINGENCY]	324747 2SUNST	69.0	324843 2DAWSNIN	69.0	1	LN	40	41.1	21.6	102.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	115	[REDACTED CONTINGENCY]	324865 2FREDNIA	69.0	324904 2MEKKU	69.0	1	LN	28	28.2	13.4	100.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	116	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324693 2PRINCE	69.0	1	LN	28	31.1	18.7	111	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	116	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324769 2WALKRKU	69.0	1	LN	28	30.6	18.2	109.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	116	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	29.7	21	106	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	116	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	69.1	61.1	103.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	143	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324693 2PRINCE	69.0	1	LN	28	32.7	18.7	116.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	143	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324769 2WALKRKU	69.0	1	LN	28	32.2	18.2	115.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	143	[REDACTED CONTINGENCY]	324578 2HRDSTB	69.0	324769 2WALKRKU	69.0	1	LN	28	28.3	14.1	101.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	143	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	29.2	21	104.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	144	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	69.9	61.1	104.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	145	[REDACTED CONTINGENCY]	324512 2EDDY P	69.0	324693 2PRINCE	69.0	1	LN	64	86.4	38.2	135	67.5	30.5	105.5	18.9		4.53237	Violation made worse by suspension
2017SH	145	[REDACTED CONTINGENCY]	324512 2EDDY P	69.0	362916 2KY DAM	69.0	1	LN	70	90.1	41.8	128.7	71.2	34.1	101.7	18.9		4.53237	Violation made worse by suspension
2017SH	145	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	362916 2KY DAM	69.0	Z1	LN	71.7	77.8	36.2	108.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	145	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	96.3	61.1	144.4	83.2	56.1	124.7	13.1		3.14149	Violation made worse by suspension
2017SH	147	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	31.5	21	112.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	590	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	68.1	61.1	102.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	591	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	67.9	61.1	101.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	592	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	68.1	61.1	102.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	593	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324693 2PRINCE	69.0	1	LN	28	31	18.7	110.8	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	593	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324769 2WALKRKU	69.0	1	LN	28	30.5	18.2	109	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	593	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	29.7	21	106.2	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	593	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	69	61.1	103.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	594	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324693 2PRINCE	69.0	1	LN	28	30	18.7	107.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	594	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324769 2WALKRKU	69.0	1	LN	28	29.5	18.2	105.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	594	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	28.5	21	101.9	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	594	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	69	61.1	103.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	595	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324693 2PRINCE	69.0	1	LN	28	31	18.7	110.6	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	595	[REDACTED CONTINGENCY]	324577 2HRDSTA	69.0	324769 2WALKRKU	69.0	1	LN	28	30.4	18.2	108.7	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	595	[REDACTED CONTINGENCY]	324628 2MARI S	69.0	324629 2MARONKU	69.0	1	LN	28	29.7	21	106.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	595	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	68.9	61.1	103.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	33	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	244.5	192.7	103	230.2	185.5	97	14.3		3.42926	Violation made worse by suspension
2017SH	17	[REDACTED CONTINGENCY]	362116 2KY HYDRO	69.0	99C243	1.00	1	TR	66.7	68.1	61.1	102.1	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	52	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	273.6	182.1	103.3	259.9	175.2	98.1	13.7		3.28537	Violation made worse by suspension
2017SH	52	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	282.3	192.7	118.9	268	185.5	112.9	14.3		3.42926	Violation made worse by suspension
2017SH	53	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	273.8	182.1	103.3	260.1	175.2	98.1	13.7		3.28537	Violation made worse by suspension
2017SH	53	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	282.4	192.7	119	268.1	185.5	113	14.3		3.42926	Violation made worse by suspension
2017SH	54	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	273.8	182.1	103.3	260.1	175.2	98.1	13.7		3.28537	Violation made worse by suspension
2017SH	54	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	282.4	192.7	119	268.1	185.5	113	14.3		3.42926	Violation made worse by suspension
2017SH	62	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	278.1	182.1	105	261.6	175.2	98.7	16.5		3.95683	Violation made worse by suspension
2017SH	62	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	283.7	192.7	119.5	267	185.5	112.5	16.7		4.0048	Violation made worse by suspension
2017SH	67	[REDACTED CONTINGENCY]	325077 5COLEMAN TAP	161	325078 5PADUCAH PRI	161	1	LN	245	260.6	186.4	106.4	235.9	171.9	96.3	24.7		5.92326	Violation made worse by suspension
2017SH	67	[REDACTED CONTINGENCY]	340618 5LIVING	161	36C026 5BARKLEY HP	161	1	LN	223	294.5	95.9	132	250.3	79.7	112.2	44.2		10.5995	Violation made worse by suspension
2017SH	69	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	238.1	192.7	100.3	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SH	75	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	240.7	192.7	101.4	226.2	185.5	95.3	14.5		3.47722	Violation made worse by suspension

2017SH	80	[REDACTED CONTINGENCY]	325077 5COLEMAN TAP	161	325078 5PADUCAH PRI	161	1	LN	245	258.1	186.4	105.1	237.6	171.9	97	20.5		4.91607	Violation made worse by suspension
2017SH	80	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	283.9	182.1	107.1	267.1	175.2	100.8	16.8		4.02878	Violation made worse by suspension
2017SH	84	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	244.5	192.7	103	230.2	185.5	97	14.3		3.42926	Violation made worse by suspension
2017SH	87	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	244.5	192.7	103	230.2	185.5	97	14.3		3.42926	Violation made worse by suspension
2017SH	89	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	240.3	192.7	101.3	226.6	185.5	95.5	13.7		3.28537	Violation made worse by suspension
2017SH	46	[REDACTED CONTINGENCY]	325077 5COLEMAN TAP	161	325078 5PADUCAH PRI	161	1	LN	245	258.2	186.1	105.4	233.4	171.9	95.3	24.8		5.94724	Violation made worse by suspension
2017SH	46	[REDACTED CONTINGENCY]	340618 5LIVING	161	36C326 5BARKLEY HP	161	1	LN	223	287.8	95.9	129.1	243.7	79.7	109.3	44.1		10.5755	Violation made worse by suspension
2017SHCentOff	33	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	238.3	189.1	100.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SHCentOff	355	[REDACTED CONTINGENCY]	324712 25 PADUC	69.0	362116 2RY HYDRO	69.0	1	LN	20	21.3	6.1	106.5	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SHCentOff	52	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	267	178.7	100.7	252.8	171.6	95.4	14.2		3.40528	Violation made worse by suspension
2017SHCentOff	52	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	275.4	189.1	116	260.5	181.6	109.8	14.9		3.57314	Violation made worse by suspension
2017SHCentOff	53	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	267.1	178.7	100.8	252.9	171.6	95.4	14.2		3.40528	Violation made worse by suspension
2017SHCentOff	53	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	275.5	189.1	116.1	260.7	181.6	109.9	14.8		3.54916	Violation made worse by suspension
2017SHCentOff	54	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	267.1	178.7	100.8	252.9	171.6	95.5	14.2		3.40528	Violation made worse by suspension
2017SHCentOff	54	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	275.5	189.1	116.1	260.7	181.6	109.9	14.8		3.54916	Violation made worse by suspension
2017SHCentOff	62	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	271.1	178.7	102.3	253.9	171.6	95.8	17.2		4.1247	Violation made worse by suspension
2017SHCentOff	62	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	276.5	189.1	116.5	259.1	181.6	109.2	17.4		4.17266	Violation made worse by suspension
2017SHCentOff	67	[REDACTED CONTINGENCY]	340618 5LIVING	161	36C326 5BARKLEY HP	161	1	LN	223	276.4	88.1	123.9	230.5	71.3	103.4	45.9		11.0072	Violation made worse by suspension
2017SHCentOff	80	[REDACTED CONTINGENCY]	340568 5BRYAN	161	34C620 5MCRACK	161	1	LN	265	276.7	178.7	104.4	259.2	171.6	97.8	17.5		4.19664	Violation made worse by suspension
2017SHCentOff	84	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	238.3	189.1	100.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SHCentOff	87	[REDACTED CONTINGENCY]	360016 5MARSHALL KY	161	36C496 5C-33	161	1	LN	237.3	238.3	189.1	100.4	#N/A	#N/A	#N/A	#N/A		#N/A	Violation caused by suspension
2017SHCentOff	46	[REDACTED CONTINGENCY]	340618 5LIVING	161	36C326 5BARKLEY HP	161	1	LN	223	269.8	88.1	121	223.9	71.3	100.4	45.9		11.0072	Violation made worse by suspension

MISO Wilson 1 Attachment Y Study - Compare Voltage Results
CONFIDENTIAL / REDACTED

	Contingency		Limiting Element							Wilson 1 OFF			Wilson 1 On			Unit Impact	
Model	Ncon	Contingency Description	Bus #	Bus Name	KV	Area	Zone	Low Limit	Upp Limit	Cont Volt	Base Volt	Viol	Cont Volt	Base Volt	Viol	Voff-Von (>0.01)	MISO Comments
2014SP	479	[REDACTED CONTINGENCY]	348922	4PRINCETON	138	357	1332	0.9	1.1	0.7466	1.0297	L	0.7361	1.0297	L	0.011	pre-existing
2014SP	295	[REDACTED CONTINGENCY]	348806	4DUPO FERRY	138	357	1332	0.9	1.1	0.7801	1.0166	L	0.7646	1.0166	L	0.016	pre-existing
2017SP	207	[REDACTED CONTINGENCY]	348715	4VALMEYER	138	357	1332	0.9	1.1	0.6055	1.0082	L	0.5903	1.0082	L	0.015	pre-existing
2017SP	333	[REDACTED CONTINGENCY]	348728	4W MT VERN W	138	357	1332	0.9	1.1	0.5549	1.0307	L	0.5384	1.0307	L	0.017	pre-existing
2017SP	371	[REDACTED CONTINGENCY]	249734	08GNCSTJ	138	208	1220	0.9	1.05	0.8669	1.0038	L	#N/A	#N/A	#N/A	#N/A	Violation caused by suspension
2017SP	371	[REDACTED CONTINGENCY]	249735	08GNCSTL	138	208	1220	0.9	1.05	0.8681	0.9917	L	#N/A	#N/A	#N/A	#N/A	Violation caused by suspension
2017SP	371	[REDACTED CONTINGENCY]	249786	08LNSTAR	138	208	1220	0.9	1.05	0.8665	0.9926	L	#N/A	#N/A	#N/A	#N/A	Violation caused by suspension
2017SP	371	[REDACTED CONTINGENCY]	249790	08LSTARJ	138	208	1220	0.9	1.05	0.8671	0.9931	L	#N/A	#N/A	#N/A	#N/A	Violation caused by suspension
2017SP	371	[REDACTED CONTINGENCY]	249897	08MANHTN	138	208	1220	0.9	1.05	0.8669	1	L	#N/A	#N/A	#N/A	#N/A	Violation caused by suspension
2017SP	405	[REDACTED CONTINGENCY]	249808	08NALBNY	138	208	1220	0.9	1.05	0.8853	1.0155	L	#N/A	#N/A	#N/A	#N/A	Violation caused by suspension
2017SPCentOff	195	[REDACTED CONTINGENCY]	348924	4KEWANEE STP	138	357	1332	0.9	1.1	1.4397	1.036	H	#N/A	#N/A	#N/A	#N/A	pre-existing
2017SPCentOff	333	[REDACTED CONTINGENCY]	348728	4W MT VERN W	138	357	1332	0.9	1.1	0.5549	1.0307	L	0.5383	1.0307	L	0.017	pre-existing
2017SPCentOff	333	[REDACTED CONTINGENCY]	348828	4W MT VERN E	138	357	1332	0.9	1.1	0.6953	1.0307	L	0.6848	1.0307	L	0.011	pre-existing
2017SHCentOff	303	[REDACTED CONTINGENCY]	348809	4COLLINSVLLE	138	357	1332	0.9	1.1	0.8012	1.0128	L	0.7907	1.0129	L	0.011	pre-existing
2017SHCentOff	316	[REDACTED CONTINGENCY]	348918	4HENNEPIN S	138	357	1332	0.9	1.1	0.2564	1.04	L	0.2339	1.04	L	0.023	pre-existing
2017SHCentOff	316	[REDACTED CONTINGENCY]	348934	4HENNEPIN N	138	357	1332	0.9	1.1	0.2564	1.04	L	0.2339	1.04	L	0.023	pre-existing

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Application of Big Rivers Electric Corporation for a General Adjustment in Rates	)))	Case No. 2012-00535

BIG RIVERS ELECTRIC CORPORATION'S MOTION TO STRIKE PORTIONS OF THE SUPPLEMENTAL TESTIMONY OF FRANK ACKERMAN

1. Big Rivers Electric Corporation ("Big Rivers") hereby moves the Kentucky Public Service Commission (the "Commission") to strike portions of testimony from the Supplemental Testimony of Frank Ackerman (the "Supplemental Testimony") filed on behalf of Sierra Club. As grounds for its motion, Big Rivers states the following.

2. As set forth in Big Rivers' Motion to Strike filed on May 29, 2013, Dr. Ackerman's direct testimony in this proceeding relied heavily on testimony filed in a different proceeding[1] by his colleagues Rachel S. Wilson and William Steinhurst. Neither Ms. Wilson nor Mr. Steinhurst is a witness in the current proceeding.

3. Dr. Ackerman's Supplemental Testimony relies heavily on the work and conclusions of Ms. Wilson.

4. For the reasons set forth in Big Rivers May 29, 2013 Motion to Strike,[2] Big Rivers remains concerned that Dr. Ackerman's incorporation of his colleagues' prior testimony

---

[1] *See The Application of Big Rivers for Approval of Its 2012 Environmental Compliance Plan, for Approval of Its Amended Environmental Cost Recovery Surcharge Tariff, for Certificates of Public Convenience and Necessity, and for Authority to Establish a Regulatory Account*, Case No. 2012-00063.

[2] *See, e.g., Am. Beauty Homes Corp. v. Louisville and Jefferson Co. Planning and Zoning Comm.*, 379 S.W.2d 450, 456 (Ky. 1964) (parties in administrative proceedings are "entitled to procedural due process"); *Somsen v. Sanitation Dist. of Jefferson Co.*, 197 S.W.2d 410, 411 (Ky. 1946) (due process requires that a party be given "sufficient notice and opportunity to make his defense"); 16 Am.Jur.2d Const. Law § 1013 (Due process is violated where a party is not given the chance to test, explain, or refute evidence considered by the fact-finder). *See also generally* Motion to Strike (May 29, 2013).

from a different proceeding will violate Big Rivers' due process right to conduct a thorough and meaningful cross-examination.

5. Big Rivers recognizes that the Commission denied Big Rivers' previous Motion to Strike "on the basis of Sierra Club's representation that Dr. Ackerman will be able to answer questions about the Wilson and Steinhurst testimonies . . . ."[3] Big Rivers files the present motion primarily for the purposes of preserving its rights on appeal because Dr. Ackerman's Supplemental Testimony was filed after the issuance of the Commission's Order.

WHEREFORE, for the reasons set forth above, Big Rivers respectfully requests that the Commission strike the following portions of the Supplemental Testimony of Frank Ackerman Testimony: pp. 2:21-3:11; p. 4:4-7; p. 6:4-6; p. 10:7-11.

On this the 29th day of June, 2013.

Respectfully submitted,

James M. Miller
Tyson A. Kamuf
SULLIVAN, MOUNTJOY, STAINBACK
& MILLER, P.S.C.
100 St. Ann Street
P. O. Box 727
Owensboro, Kentucky 42302-0727
Phone: (270) 926-4000
Facsimile: (270) 683-6694
jmiller@smsmlaw.com
tkamuf@smsmlaw.com

and

[3] Order, p. 3 (June 24, 2013).

Edward T. Depp
Dinsmore & Shohl LLP
101 South Fifth Street
Suite 2500
Louisville, KY 40202
Phone: (502) 540-2347
Facsimile: (502) 585-2207
tip.depp@dinsmore.com

Counsel for Big Rivers Electric Corporation

Certificate of Service

I certify that a true and accurate copy of the foregoing has been served by electronic email on this date and was or will be served by Federal Express, by hand delivery, or by first class mail, postage prepaid, upon the persons listed on the service list accompanying this petition, on the date this petition is filed with the Kentucky Public Service Commission.

On this the 29th day of June, 2013.

Counsel for Big Rivers Electric Corporation

2471442v1

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Application of Big Rivers Electric Corporation for a General Adjustment in Rates	)))	Case No. 2012-00535

RESPONSE OF BIG RIVERS ELECTRIC CORPORATION TO MOTION OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. FOR LEAVE TO USE IN THE PUBLIC HEARING INFORMATION FILED UNDER SEAL BY BIG RIVERS ELECTRIC CORPORATION

Comes Big Rivers Electric Corporation ("Big Rivers"), by counsel, and for its response to the Motion for Leave to Use in the Public Hearing Information Filed Under Seal By Big Rivers Electric Corporation (the "Motion") filed by Kentucky Industrial Utility Customers, Inc. ("KIUC"), states as follows:

A. FACTUAL BACKGROUND

1. In its Responses to the Attorney General's Initial Data Requests filed on February 28, 2013 and its Rebuttal Testimony filed on June 24, 2013, Big Rivers provided information for which it sought confidential protection (the "Confidential Information") from the Commission.

3. By Order dated May 6, 2013, the Commission granted Big Rivers' February 28 Petition for Confidential Treatment (the "February Confidentiality Petition"). Big Rivers' June 24 Petition for Confidential Treatment (the "June Confidentiality Petition") is pending.

4. Information that is the same type of information as confidential information contained in the February 28 data request responses and the June 24 Rebuttal

Testimony was also contained in information that Big Rivers filed under petitions for confidential treatment on or about January 15, 2013; January 29, 2013; February 15, 2013; March 6, 2013; March 18, 2013; March 28, 2013; April 25, 2013; May 15, 2013; May 17, 2013; and June 24, 2013. By orders dated May 6, 2013, and April 25, 2013, respectively, the Commission granted the January 15 and January 29 petitions for confidential treatment for the types of information that KIUC wishes to publicly disclose at the hearing (projected off-system sales price projections and projected operating and maintenance and capital costs). The other petitions are still pending.

5. KIUC served its Motion by electronic mail at 4:30 p.m. on the Friday before the evidentiary hearing in this matter and therein requested leave to avoid 807 KAR 5:001 (13)(9)(b), which provides that the Commission shall enter closed session to allow a party to engage in direct testimony and cross-examination related to confidential material.

B. ARGUMENT

6. 807 KAR 5:001 (13)(2)(e) requires a response to a petition for confidentiality within seven (7) days after the petition is filed with the Commission. By failing to file a timely response to Big Rivers' February Confidentiality Petition, KIUC waived its opportunity to challenge that petition. KIUC took no other timely action to contest the May 6 Order.

7. The June Confidentiality Petition seeks protection for, among other things, production costs, financial data and metrics, projected off-system sales data, and operation and maintenance ("O&M") expenses. This is the same type of material for which the Commission has previously granted Big Rivers confidential treatment, and on

the same grounds. *See, e.g., In the Matter of Application of Big Rivers Electric Corporation for an Adjustment in Rates,* Order, P.S.C. Case No. 2012-00535 (May 6, 2013) (granting confidential treatment to Big Rivers' Financial Model, Statement of Operations, and Cost of Service Study); *In the Matter of: Application of Big Rivers Electric Corporation for Approval of its 2012 Environmental Compliance Plan, for Approval of its Amended Environmental Cost Recovery Surcharge Tariff for Certificates of Public Convenience and Necessity, and for Authority to Establish a Regulatory Account*, Letter, P.S.C. Case No. 2012-00063 (December 11, 2012) (granting confidential treatment to Big Rivers' O&M expenses, and off-system sales and revenues); *In the Matter of Application of Big Rivers Electric Corporation for a General Adjustment in Rates*, Letter, P.S.C. Case No. 2012-00036 (December 20, 2011) (granting confidential treatment to budgets, financial model outputs, and fuel cost projections); *In the Matter of Application of Big Rivers Electric Corporation for a General Adjustment in Rates*, Letter, P.S.C. Case No. 2012-00036 (July 28, 2011) (granting confidential treatment to financial model outputs); In the Matter of The 2010 Integrated Resource Plan of Big Rivers Electric Corporation, Letter, P.S.C. Case No. 2010-00443 (December 21, 2010) (granting confidential treatment to fuel cost projections, revenue projections, and financial model outputs).

8. Although the Commission has not yet ruled on Big Rivers' June Confidentiality Petition, the material specified therein "shall be accorded confidential treatment" while the petition is pending. 807 KAR 5:001 (13)(4). KIUC has not filed a response contesting the June Confidentiality Petition.

9. Even if the Commission treats KIUC's Motion as a timely response to Big Rivers' June Confidentiality Petition, KIUC has shown no reason why the Confidential Information provided on June 24 should be accorded treatment different than what was afforded to the same types of information recognized as confidential in the Commission's April 25 and May 6 orders.

10. KIUC claims that the capacity and market price forecasts that Big Rivers filed are not confidential in nature because other customers of Wood-Mackenzie, IHS Global, and ACES could purchase such information. While true, Big Rivers has relied on these projections, and public disclosure of them would reveal Big Rivers' expectation of forward prices.

11. Public disclosure of the price projections would also injure Wood-Mackenzie, IHS Global, and ACES because the projections are a product they sell.

12. KIUC claims that Big Rivers' projected market price projections and projected O&M expenses are not confidential. However, given that Big Rivers is actively marketing capacity that will be available due to the smelter contract terminations, it is more important than ever for Big Rivers' production costs to remain confidential. Big Rivers is also responding to requests for proposals and is negotiating with potential counterparties for power sales contracts. If these counterparties knew Big Rivers projected market prices and projected O&M costs, they would have an advantage in negotiations that they otherwise would not have. They could use the projections as a benchmark in the negotiations to Big Rivers' competitive disadvantage.

13. Big Rivers also notes that KIUC claims in its June 10, 2013, petition for confidential treatment that production costs (such as energy costs) for Aleris, Domtar,

and Kimberly Clark are commercially sensitive and entitled to confidential protection. It is thus disingenuous to claim that production costs are not generally recognized as confidential.

14. Additionally, public disclosure of O&M costs and capital costs would allow suppliers of goods and services to use the projections as a benchmark, which would increase costs to Big Rivers and make Big Rivers less competitive in wholesale power and credit markets, as explained in more detail in Big Rivers' petitions for confidential treatment.

15. KIUC lastly claims that negotiations between Big Rivers, Century, and Alcan are no longer confidential now that Century and Alcan have terminated their contracts. However, the contracts for the Hawesville smelter have not been signed, several conditions to closing have not been satisfied, and there is not yet a contract for the Sebree smelter. KIUC acknowledges that "[t]his information was certainly confidential prior to the Smelters serving their termination notices." Nothing has changed in that regard since termination of those contracts.

16. Moreover, even if the Commission were to treat KIUC's Motion as a timely response to Big Rivers' June Confidentiality Petition, were to agree with KIUC's arguments, and were to deny the June Confidentiality Petition (notwithstanding its April 25 and May 6 orders), the Confidential Information cannot be made public during the hearing. The Commission's rules establish that if a petition for confidential treatment is denied, the information identified in that petition "shall not be placed in the public record for twenty (20) days to allow the requesting party to petition the Commission." 807 KAR 5:001 (13)(3)(f). Thus, even if the Commission were to deny the June Confidentiality

Petition at the hearing, Big Rivers' Confidential Information still cannot enter the public record until weeks after the hearing is complete.

17. Whether it is due to a lack of vigilance, or calculated procedural gamesmanship, KIUC's delay has made its requested relief impossible. Nevertheless, KIUC will not be prejudiced in any way by the continued confidential treatment of Big Rivers' Confidential Information. Big Rivers is confident that KIUC's counsel will be able to properly tailor its questions to avoid publicly disclosing Confidential Information during the hearing, and that is what the Commission should direct KIUC's counsel to do.

WHEREFORE, Big Rivers respectfully requests that the Commission deny KIUC's Motion.

On this the 29th day of June, 2013.

Respectfully submitted,

James M. Miller
Tyson Kamuf
SULLIVAN, MOUNTJOY, STAINBACK & MILLER, P.S.C.
100 St. Ann Street
P. O. Box 727
Owensboro, Kentucky 42302-0727
Phone: (270) 926-4000
Facsimile: (270) 683-6694
jmiller@smsmlaw.com
tkamuf@smsmlaw.com

Edward T. Depp
Dinsmore & Shohl LLP
101 South Fifth Street
Suite 2500
Louisville, KY 40202
Phone: (502) 540-2347
Facsimile: (502) 585-2207
tip.depp@dinsmore.com
Counsel for Big Rivers Electric Corporation

Certificate of Service

I certify that a true and accurate copy of the foregoing has been served by electronic email on this date and was or will be served by Federal Express, by hand delivery, or by first class mail, postage prepaid, upon the persons listed on the service list accompanying this response, on the date this response is filed with the Kentucky Public Service Commission.

On this the 29th day of June, 2013,

Counsel for Big Rivers Electric Corporation