

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A DECLARATORY ORDER)	CASE NO.
)	2016-00278
)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation ("Big Rivers"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 10, 2016. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Big Rivers shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Big Rivers fails or refuses to furnish all or part of the requested information, Big Rivers

shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Big Rivers shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Big Rivers' response to Commission Staff's Initial Request for Information ("Staff's First Request"), Item 6. Provide a copy of the bill issued by Big Rivers to Henderson for the month of May 2016.

2. Refer to Big Rivers' response to the City of Henderson, Kentucky, and Henderson Utility Commission, d/b/a Henderson Municipal Power and Light's First Request for Information ("Henderson's First Request"), Item 1, page 2 of 2. The last sentence of the response states, "Thus, if Big Rivers is required to take the uneconomic Excess Henderson Energy, its FAC charges to its members will generally be greater than they would have been had Big Rivers been able to exercise its contractual right not to take such energy."

a. State whether this response means that, in instances when Big Rivers does not take the uneconomic Excess Henderson Energy, it would operate one of its own units at a cheaper cost.

b. When Big Rivers takes the uneconomic Excess Henderson Energy and such power is in excess of Big Rivers' load requirements, state whether Big Rivers

is able to reduce generation at one or more of its units, or is it only after the fact that Big Rivers is made aware of the amount of Excess Henderson Energy that is uneconomic.

c. State whether there are times when the Excess Henderson Energy does not clear in the Midcontinent Independent System Operator, Inc. ("MISO") market.

3. Refer to Big Rivers' response to Henderson's First Request, Item 13, page 2 of 2, the last sentence. Provide the journal entries made by Big Rivers related to the variable production costs of Excess Henderson Energy for the months of May 2016, June 2016, and July 2016.

4. Refer to Big Rivers' response to Henderson's First Request, Item 14. Explain the consequences of depletion of either of Henderson's coal or lime reagent inventories.

5. Confirm that Big Rivers remits revenue to Henderson for Henderson's share of Station Two when capacity from Station Two is sold into the MISO capacity market.



Talina R. Mathews
Executive Director
Public Service Commission
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DATED SEP 27 2016

cc: Parties of Record

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