

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DEMAND-SIDE MANAGEMENT FILING OF BIG)	
RIVERS ELECTRIC CORPORATION ON)	CASE NO.
BEHALF OF ITSELF, JACKSON PURCHASE)	2018-00236
ENERGY CORPORATION, AND MEADE)	
COUNTY R.E.C.C. AND REQUEST TO)	
ESTABLISH A REGULATORY LIABILITY)	

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

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information. The information requested herein is due no later than September 14, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. 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.

BREC shall make timely amendments 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 BREC fails or refuses to furnish all or part of the requested information, it 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a document containing personal information, BREC 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 the Application, paragraph 20.
 - a. Provide the amount per program spent to date on BREC demand-side management (DSM) programs.
 - b. Provide the estimated amount per DSM program BREC anticipates to spend between now and December 31, 2018.
2. Refer to the Direct Testimony of Russell L. Pogue (Pogue Testimony) page 4, lines 16–28. Provide the estimated number of retail members that may have begun to make investments and the estimated incentive amounts.
3. Refer to the Pogue Testimony page 9, lines 2–5.

a. Explain why BREC believes education concerning electric vehicles should be considered a DSM initiative and should be included in the DSM budget.

b. Explain why BREC believes renewable energy should be considered a DSM initiative and should be included in the DSM budget.

c. Provide a copy of all education materials associated with the proposed Energy Use Education Program.

4. Refer to the Pogue Testimony page 9, lines 19–23.

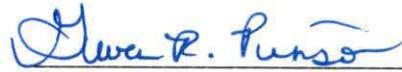
a. Explain whether BREC or a member system has met with the Community Action Agencies or the Kentucky Housing Corporation. If so, provide a copy of all meeting minutes.

b. Provide a list of all weatherization assistance measures that BREC will provide.

c. Provide the cost per participant that BREC has budgeted for the Low-Income Assistance Program.

d. Provide any contracts or agreements between BREC and Community Action Agencies or the Kentucky Housing Corporation.

5. Refer to the Pogue Testimony page 10, lines 18–28, and continuing through page 11. Explain in detail why the proposed regulatory liability for DSM revenues collected in Rural base rates in excess of DSM spending is to be offset against the entire Wilson regulatory asset rather than against the Rural customers' share of the Wilson regulatory asset.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED **AUG 29 2018**

cc: Parties of Record

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