

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)	
CORPORATION FOR A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY TO)	2019-00417
CONSTRUCT A 345 KV TRANSMISSION LINE IN)	
MEADE COUNTY, KENTUCKY)	

COMMISSION STAFF'S SECOND 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 following information on or before March 30, 2020. The Commission directs BREC to the Commission's March 16, 2020 Order in Case No. 2020-00085,¹ regarding the filing of physical documents with the Commission. The Commission expects that original documents will be filed with the Commission within 30 days of the lifting of the current state of emergency.²

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 the person supervising the preparation of the response on behalf of the entity

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020).

² Any electronic email filed in this matter should be sent to PSCED@ky.gov, and each message should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 amendment to any prior response if BREC 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, BREC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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, 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, page 2, lines 20–21, and page 6, paragraph 15, which reference the proposed 345-kV transmission line extending from the Redmon Road Switching Station to the Otter Creek Substation as being 2.7 miles in length. Refer also to the application, Exhibit C, 345 & 161 kV Transmission Lines Brandenburg Steel Mill Routing Study (Routing Study), pages 4 and 48, which references the 345-kV transmission line from the Redmon Road Switching Station to the Otter Creek Substation as being 2.58 miles in length. Provide a detailed explanation reconciling the differences in the length of the proposed 345-kV transmission line from the Redmon Road Switching Station to the Otter Creek Substation.

2. Refer to BREC's response to Commission Staff's First Request for Information (Staff's First Request), Item 4(b).

a. Provide the rationale for BREC agreeing to transfer ownership of the Redmon Road Switching Station to Louisville Gas and Electric Company (LG&E) that was agreed to as part of the settlement agreement proposed and approved in Case No. 2019-00370.³

b. If not answered in part a., explain why LG&E would not allow BREC to own the substation and simply provide an interconnection to its line.

3. Refer to BREC's response to Staff's First Request, Item 4(a), regarding the \$6 million in incremental transmission revenues annually that BREC will receive under MISO's Open Access Transmission Tariff resulting from the proposed transmission projects.

a. Confirm that the annual increase of \$6 million in transmission revenues takes into account the transfer of ownership of the Redmon Road Switching Station from BREC to LG&E.

b. Explain whether any part of the \$6 million is accounted for in the transmission revenues enumerated in BREC's December 11, 2019 response to Staff's Initial Request for Information Item 4a in Case No. 2019-00365.⁴

³ Case No. 2019-00370, *Electronic Joint Application of Louisville Gas and Electric Company, Meade County Rural Electric Cooperative Corporation, and Big Rivers Electric Corporation for (1) Approval of an Agreement to Modify an Existing Territorial Boundary Map and (2) Establishing Meade County Rural Electric Cooperative Corporation as the Retail Electric Supplier for Nucor Corporation's Proposed Steel Plate Mill in Buttermilk Falls Industrial Park in Meade County, Kentucky* (Ky. PSC Feb. 4, 2020).

⁴ Case No 2019-00365, *Joint Application of Big Rivers Electric Corporation and Meade County Rural Electric Cooperative Corporation for Approval of Contracts for Electric Service With Nucor Corporation and Application of Tariff*, (Filed Oct. 18, 2019).

4. Refer to BREC's response to Staff's First Request, Items 2 and 4(a). Explain whether the approximate \$2.5 million offset referenced in Item 2 is in part the result of the \$6 million referenced in Item 4a.

5. Refer to the Routing Study, page 55, indicating the following criteria and assigned weights with respect to the Expert Judgment Model: Cost – 40 percent; Construction/Maintenance Accessibility – 30 percent; Community Consideration – 20 percent; and Schedule Delay Risk – 10 percent. Refer also to the Routing Study, page 56, Figure 50, which shows the following criteria and assigned weights for the Expert Judgment Model: Cost – 35 percent; Construction/Maintenance Accessibility – 5 percent; Community Issues – 30 percent; Schedule Delay Risk – 15 percent; Natural Environment Considerations – 10 percent; and Reliability 5 percent. Provide an explanation reconciling the differing criteria and assigned weights for the Expert Judgment Model.



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DATED MAR 18 2020

cc: Parties of Record

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