

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BIG RIVERS)	
ELECTRIC CORPORATION FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY TO CONSTRUCT A 161 KV)	2022-00012
TRANSMISSION LINE IN HENDERSON)	
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 an electronic version of the following information. The information requested is due on April 18, 2022. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 that indicates 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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 BREC's response to Commission Staff's First Request for Information, Item 1. Even though BREC is seeking private financing and thus not required to conduct a National Environmental Policy Act (NEPA) review, explain whether any sort of similar review has been undertaken for this project. If so, explain what study BREC has undertaken and the results of the study.

2. Refer to BREC's response to Commission Staff's First Request for Information, Item 9.

a. Confirm that BREC does not own the HMPL 161 kV line that will parallel the proposed line for part of the proposed route.

b. Explain why the proposed substation and the Pratt paper mill could not be served from the existing BREC 161 kV T Line.

c. Also refer to BREC's response to Commission Staff's First request, Item 12. It appears that the proposed 161 kV line will tie in with the existing 161 kV T Line at the new proposed substation, perhaps looping two circuits. Provide a map which shows the broader transmission configuration and explain further how tying the two lines together enhances reliability and accommodates expected load growth.

3. Refer to BREC's response to Commission Staff's First Request for Information, Item 13. Confirm that BREC has permission from existing affected landowners to move the proposed transmission line up to 500 feet on either side of the center line, if necessary, so long as no new landowners are affected.

4. Refer to BREC's response to Commission Staff's First Request for Information, Item 15. Confirm that BREC has the requisite permission from affected landowners to move the proposed substation to a different location within the property boundary.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED APR 01 2022

cc: Parties of Record

*Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Roger Hickman
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Senthia Santana
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Sandra D. Freeburger
Deitz, Shields, & Freeburger, LLP
101 First Street
P.O. Box 21
Henderson, KENTUCKY 42419

*Tyson Kamuf
Corporate Attorney
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420