

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 THIRD 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 May 17, 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 Application, the maps provided on PDF pages 27–32.
 - a. Provide the distance from the proposed centerline to the closest residence, include the parcel number on which the residence closest to the centerline is located.
 - b. Provide the distance from the proposed centerline to the closest structure; identify the structure and the parcel number on which it is located.
 - c. Refer also to Application, page 9. Explain whether the request to expand the right of way (ROW) corridor to 500 feet from the proposed centerline means that if the centerline had to be moved 500 feet in order to avoid an obstacle, once that

obstacle had been passed, the ROW would revert to the standard 250 foot ROW corridor. If not, explain what the request means.

d. Refer also to Application, page 9 and Attachment D, pages 50 and 59. Explain whether expanding the proposed right of way to 1,000 feet (500 feet on either side of the centerline) would alter the selection of the preferred route.

e. Refer also to Application, page 9 and Attachment D, pages 50 and 59. Explain how many residential, commercial and industrial structures would be affected by expanding the ROW to 1,000 feet.

2. Refer to BREC's response to Commission Staff's First Request for Information (Staff's First Request), Item 12, lines 6–8.

a. Explain whether the term "oversubscription" means that the additional demand placed on the 69 kV circuit by the Pratt Paper Mill and the anticipated load growth from the additional workers and any other anticipated economic development would be greater than the 69 kV line's capacity. If not, explain in greater detail why the 69 kV circuit is unsuitable.

b. Explain whether the Pratt Paper Mill's load, by itself, would cause "oversubscription" on the 69 kV line.

c. Explain in greater detail what "the reliability and power quality issues expected with that scenario" means and provide any the results of the Midcontinent Independent System Operator (MISO) or BREC transmission load studies or other documentation to support the existence of reliability and power quality issues in the referenced area.

d. State whether oversubscription of the 69 kV network is only a concern due to the Pratt Paper Mill or if there is a possibility of oversubscription of the 69 kV network without the addition of the Pratt plant.

3. BREC has submitted information that a contract is being negotiated between BREC and Pratt Paper Mill. Provide an outline of the contract and a description of the material terms.

4. Refer to BREC's response to Staff's First Request, Item 13b.

a. Clarify what is meant by "a field review of the proposed route" and explain what is entailed in conducting a field review.

b. Provide the field review report or any documents prepared for BREC's internal review subsequent to the field review.

c. Confirm that the field review included a sub-terrain analysis.

5. Refer to BREC's response to Commission Staff's Second Request for Information, Item 2,

a. Confirm that Henderson Municipal Power and Light (HMPL) agreed to relocate their 161 kV line that is in proximity to the project, and to re-terminate it at the proposed South Henderson Switching Station. If so, provide the agreement between BREC and HMPL.

b. Provide the estimated cost to relocate and re-terminate the HMP&L 161 kV line and confirm that BREC is responsible for that cost.

6. The Application page 6 of 10, lines 12–16 states that BREC is financing with cash reserves and seeking funding. According to BREC's response to Staff's First Request, Item 1, BREC is obtaining private financing.

a. Confirm that BREC will be using cash reserves initially and provide the total amount of cash reserves anticipated to be expended.

b. Explain why BREC chose to not seek funding through the United States Department of Agriculture's Rural Utilities Service and to seek private funding instead.

c. Explain whether the full amount of the project expense will be funded ultimately with debt through the private funding source. If not, explain approximately how much of BREC's general cash reserves will ultimately be used and how much debt will be used for financing.



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DATED MAY 09 2022

cc: Parties of Record

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