

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF BIG RIVERS ELECTRIC)	2022-00268
CORPORATION FROM NOVEMBER 1, 2021)	
THROUGH APRIL 30, 2022)	

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 November 28, 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 Second Request For Information (Staff's Second Request), Item 2. There are numerous other merchant solar energy developers that are seeking or have received authorization to construct solar facilities in western Kentucky. Explain whether BREC has identified or is in the process of negotiating contracts with other potential solar energy developers.

2. Refer to BREC's response to Staff's Second Request, Item 7b. If the unit is on Economic Standby and not operating, explain whether the unit is consuming fuel and the circumstances under which the unit may or may not consume fuel.

3. Refer to BREC's response to Staff's Second Request, Item 7c.
 - a. Explain whether it is accurate to say that if a unit is offered into the Day Ahead Market as a Must Run unit and MISO does not select a unit to run, then the unit will by online operating at its dispatchable minimum load. If not, explain how the unit would operate in this situation.
 - b. Explain whether MISO guarantees BREC recovers its cost if the unit is offered into the Day Ahead Market as Must Run and it is not selected.
 - c. Explain the circumstances under which BREC would offer its units into the MISO Day Ahead Market as either Economic or Must Run.
4. Refer to BREC's response to Staff's Second Request, Item 8.
 - a. Explain the amount of the MISO penalties and whether these penalties were passed on the ratepayers through the FAC or through other means, such as an offset to revenues or the Non-FAC PPA.
 - b. Explain whether BREC was subjected to any MISO penalties during the two previous six month FAC review periods. If so, provide the amounts of these penalties and whether they were passed on to BREC ratepayers through the FAC or by other means, such as an offset to revenues or the Non-FAC PPA.



Linda C. Bridwell, PE
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DATED NOV 09 2022

cc: Parties of Record

Case No. 2022-00268

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