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June 10, 2106

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PUBLIC SERVICE
COMMISSION

Mr. Aaron D. Greenwell
Acting Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard, P.O. Box 615
Frankfort, KY 40602-0615

***In the Matter of: Consideration of the Implementation of Smart
Grid and Smart Meter Technologies – Case No. 2012-00428***

Dear Mr. Greenwell:

Pursuant to the Public Service Commission's Order date April 13, 2016 ("the April 13 Order), in the aforementioned case, Big Rivers Electric Corporation ("Big Rivers") hereby files an original and two (2) copies of the following documents in response to the referenced Ordering Paragraphs within the April 13 Order –

1. Big Rivers' Company Policy on Customer Information and Privacy (*pursuant to Ordering Paragraph No. 4*);
2. Big Rivers' Company Policy on Smart Grid Technology Investments (*pursuant to Ordering Paragraph Nos. 4 and 10*);
3. Big Rivers' Certification of Internal Cybersecurity Procedures (*pursuant to Ordering Paragraph No. 5*).

On December 17, 2013, Big Rivers' representatives provided the Commission and Commission Staff with a Cybersecurity Overview of Big Rivers. Early in the 4th Quarter of this year Big Rivers will use the Commission's Track Meeting process to arrange the initial biennial Cybersecurity Overview and Update envisioned by the April 13 Order (*see Order, page 29*).

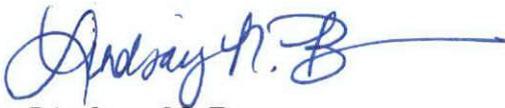
Please confirm the Commission's receipt of this information by placing the Commission's file stamp on the enclosed additional copy and returning it to Big Rivers in the self-addressed, postage-paid envelope provided.

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Mr. Aaron D. Greenwell
Acting Executive Director
Public Service Commission of Kentucky
June 10, 2016

Should you have any questions regarding this information please contact Roger Hickman at roger.hickman@bigrivers.com or 270-844-6182.

Sincerely yours,



Lindsay N. Barron
Chief Financial Officer

Enclosures

CC: Michael W. Chambliss
DeAnna M. Speed
Devin M. Berry
Tyson A. Kamuf
Roger D. Hickman



COMPANY POLICY

APPROVED BY: President & CEO
DATE LAST REVISED: 06-07-16

CUSTOMER INFORMATION AND PRIVACY

General Requirements

The Big Rivers Electric Corporation (“Big Rivers”) Customer Information Privacy Policy shall guide the use and distribution of customer¹ information within Big Rivers and to any parties outside Big Rivers, including to Big Rivers’ Member Cooperatives.² This policy defines Customer Information in Section 2 below. This Customer Information Policy is designed to conform to requirements in the laws and regulations affecting public utilities in the Commonwealth of Kentucky. It reflects the general principle expressed in KRS 278.2213(5), and outlined in Section 3 below, that “[n]o utility employee shall share any confidential customer information ... unless the customer has consented in writing, or the information is publicly available or is simultaneously made publicly available.” It does not apply to information which is already available to the public, or which becomes available to the public hereafter.

Customer Information – Definition

Big Rivers collects and maintains certain customer information and operational data when providing service to customers. Customer information includes, among other things, customer name, service address, mailing address, account number, consumption history and telephone number. Operational data includes, but is not limited to, general utility information and data about system operations.

Customer Information – Privacy

All employees of Big Rivers shall take reasonable steps to maintain the privacy³ of customer information. Customer information may be shared within Big Rivers for business purposes. It may also be shared with agents, contractors, vendors and other organizations that assist Big

¹ For purposes of this policy, the word customer is used to identify Big Rivers’ Member Cooperatives, listed in footnote 2, and the large industrial customers of Big Rivers’ Member Cooperatives for which Big Rivers prepares billing information.

² Member Cooperatives are Jackson Purchase Energy Corporation (“JPEC” or “Jackson Purchase”), Kenergy Corp. (“Kenergy”), and Meade County Rural Electric Cooperative Corporation (“MCRECC” or “Meade County”).

³ Privacy is the non-disclosure of certain customer information to third parties without the customer’s consent.

Rivers in the conduct of business. Big Rivers will not disclose personally identifiable information⁴, barring a legal obligation to do so, without the consent of the Member Cooperative.

Big Rivers may provide customer information to regulatory authorities, regulatory agencies, law enforcement authorities, or courts, or when Big Rivers believes that disclosure is reasonably necessary or appropriate to prevent physical harm or financial loss related to the conduct of business. Where practical, Big Rivers shall, to the legal extent possible, request confidential protection for such information including, but not limited to, the execution of appropriate nondisclosure agreements. Big Rivers may seek the customer's authorization for the release of the customer's information when appropriate.

Customer Information – Access

Big Rivers Member Cooperatives may have access to its customer information on reasonable notice to Big Rivers. Upon receiving such notice, Big Rivers will work expeditiously to provide that information to the Member Cooperative. Big Rivers may, in cooperation with a Member Cooperative and with its approval, provide the Member Cooperative on-line, secure access to its customer information from either Big Rivers' internet website or from any other electronic platform that is financially feasible and mutually acceptable to Big Rivers and the Member Cooperative. Assuming such on-line access is desired, no on-line access will be provided unless both Big Rivers and the Member Cooperative concur that such access is secure. Big Rivers' reasonable costs to make customer information available should be recoverable through its rates. Pursuant to 807 KAR 5:011 §2(5), Big Rivers shall provide on-line access to its approved tariff which is currently on file with the Commission, and to proposed tariff changes from general rate applications or general tariff changes.

Customer Information – Approvals

Should a Big Rivers employee have questions regarding the release of customer information outside of Big Rivers, that employee shall contact the employee's supervisor. If necessary, those questions shall be directed to Big Rivers' Chief Financial Officer or Big Rivers' Vice President – System Operations who may discuss that request with Big Rivers' President and Chief Executive Officer or others as necessary.

Customer Information – Policy Violations

All Big Rivers' employees with access to accounting, billing, and operational information for any Big Rivers' Member Cooperative, or their respective Retail Members, shall familiarize himself or herself with this policy. Employees shall report suspected violation of this policy to the employee's supervisor as soon as the employee is aware of a suspected violation. All reports of suspected violations shall be made in good faith, and there shall be no recourse on any employee making such a report in good faith.

Should Big Rivers determine that a violation has occurred, as soon as possible, Big Rivers shall inform the affected customer(s). Big Rivers shall review this policy for changes and implement any identified changes, as necessary. All Big Rivers employees subject to this policy shall be informed of changes.

Administrative Responsibility: VP Systems Operations/Chief Financial Officer.

⁴ Personally identifiable information is presumably a subset of customer information, such as account number or substation level information.

Big Rivers Policy Revision Record			
Number	Date	Notes	Approved by
Rev. 0	06-07-16	Original	President and CEO



COMPANY POLICY

APPROVED BY: President & CEO

DATE LAST REVISED: 06-07-16

SMART GRID TECHNOLOGY INVESTMENTS

The primary purpose of this Policy is to establish a uniform process for:

- Identification and technical evaluation of Smart Grid Technology Investments (SGTI)
- Budgeting and financial analysis of SGTI

General Requirements

The Director Energy Control & Compliance and the Manager Budgets are responsible for providing guidance for the SGTI process.

Transmission Planning

The transmission planning processes and applicable criteria are described in the Big Rivers document titled ***Transmission Planning Criteria and Guidelines***. As that document describes, transmission system projects are primarily identified and evaluated within the Construction Work Plan (CWP) process. Various projects are included within the CWP. These projects include reliability based projects, communication system upgrades, SGTI projects, and other significant upgrades or investments. Each CWP is submitted to the Big Rivers Board of Directors for review and approval.

Financial

The VP Systems Operations will ensure SGTI projects identified in the CWP are included in the annual Budget and Financial Plan, which is submitted to the Big Rivers Board of Directors for review and approval per Board Policy #118 – Financial Policy. Unbudgeted projects will follow the guidelines per the Company Policy #109 - AIP Policy.

Furthermore, all SGTI projects will be assigned a project manager who will ensure all appropriate forms, analysis and approvals are complete prior to starting each project. Analysis will include AIP's, Business Cases and Capital Evaluation Models, where applicable, per the aforementioned AIP Policy.

Customer Education

When applicable, Big Rivers will work with its customers¹ to ensure they are fully informed about new SGTI projects.

¹ For purposes of this policy, the word customer is used to identify Big Rivers' Member Cooperatives – Jackson Purchase Energy Corporation, Kenergy Corp., and Meade County Rural Electric Cooperative

Administrative Responsibility: VP Systems Operations/Chief Financial Officer.

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Corporation – and the large industrial customers of Big Rivers’ Member Cooperatives who may be impacted by SGTI projects.

BIG RIVERS ELECTRIC CORPORATION

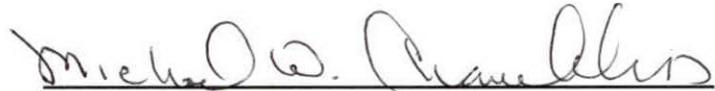
CERTIFICATION OF INTERNAL CYBERSECURITY PROCEDURES

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

CERIFICATION

Pursuant to Finding No. 5 and Ordering Paragraph No. 5 of the Commission's Order, dated April 13, 2016, in Case No. 2012-00428 –

I, Michael W. ("Mike") Chambliss, Vice President System Operations, Big Rivers Electric Corporation ("Big Rivers"), hereby state and affirm that Big Rivers has developed internal cybersecurity policies and procedures. I further state and affirm that Big Rivers' management has reviewed and approved these written cybersecurity policies and procedures which, to the best of Big Rivers' knowledge and belief, address known and reasonably foreseeable cybersecurity risks. I further state and affirm that these cybersecurity policies and procedures conform to those cybersecurity-based Mandatory Reliability Standards approved by the Federal Energy Regulatory Commission and administered by the North American Electric Reliability Corporation and the SERC Electric Reliability Corporation.



Michael W. ("Mike") Chambliss

Vice President System Operations

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Michael W. ("Mike") Chambliss on this the 6th day of June, 2016.



Notary Public, Kentucky State at Large

My Commission Expires 1-12-17