COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2024 THROUGH APRIL 30, 2025; MAY 1, 2025 THROUGH OCTOBER 31, 2025; AND NOVEMBER 1, 2025 THROUGH APRIL 30, 2026	)))))))	CASE NO. 2026-00276

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 2, 2026. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085[1] 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

[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).

person supervising the preparation of the response on behalf of the entity 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 that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 (Staff's First Request), Item 2. For the November 1, 2024 through April 30, 2025 period, BREC received coal from two different Alliance contracts. Of the two Alliance contracts, explain how BREC identifies which contract is being fulfilled by a particular delivery of coal.

2. Refer to BREC's response to Staff's First Request, Item 3.

a. In the tables, explain how Duration (In Days) is determined.

b. Explain why BREC finds it necessary to maintain a high number of days' supply of coal. Include in the response whether BREC has had problems with either purchasing or obtaining coal deliveries.

3. Refer to BREC's response to Staff's First Request, Item 7. Explain why natural gas purchases during the period from May 1, 2025, through October 31, 2025, were significantly higher than purchases during both the preceding six-month period and the subsequent six-month period.

4. Refer to BREC's response to Staff's First Request, Item 8.

a. Explain whether BREC was assessed Midcontinent Independent System Operator (MISO) performance penalties as a result of the two major weather-related events that disrupted the availability of interruptible natural gas supplies.

b. Fuel oil is a common alternate fuel for gas fired generation. Explain whether using propane as a backup short term alternate fuel source is a viable option for gas fired generation and, if not, why not.

5. Refer to BREC's response to Staff's First Request, Item 16, Attachment, page 3. It appears that the Wilson Station Unit #1 came out of a scheduled outage and was able to run between 1/25/2026 at 11:30 to 1/26/2026 at 2:34 when it was forced out due to coal being frozen in the coal surge bin. Explain whether the Wilson Unit ran during that time and, if so, how the coal was able to freeze in the surge bin if the unit was running.

6. Refer to BREC's response to Staff's First Request, Item 18. Explain the factors that caused the Green Unit 2's capacity factor to be higher than Green Unit 1's capacity factor for the entire period.

7. If not already provided, copies of all interstate pipeline transportation and storage contracts and tariffs utilized during the review periods. Provide a comparison of the terms of these transportation arrangements with those that were utilized during the five previous calendar years. Explain all efforts to ensure that interstate pipeline transportation costs were and are as low as possible.

8. If not already provided, provide copies of all current contracts for commodity gas supply. Provide a comparison of the terms of these commodity gas supply arrangements with those that were utilized during the five previous calendar years. Explain all efforts to ensure that commodity gas supply costs were and are the lowest possible cost, and consistent with security of supply.

9. Provide gas supply and capacity contract summaries showing significant contract terms, daily/monthly/annual entitlements, and pricing. Identify any capacity changes (renegotiated and expired agreements, de-contracting, assignment, or long-term release) that took place during the review periods.

10. Provide BREC's natural gas storage arrangements; state the maximum daily injection and withdrawal rates; and the decline in deliverability that occurs as natural gas is withdrawn.

11. Provide a copy of any written procedures in use by BREC for nominations of natural gas.

12. If BREC has utilized gas marketing/trading organizations to obtain gas supplies over the last five years, indicate which organizations were so employed, gas volumes purchased, prices, terms, and current contractual arrangements between BREC and these marketing firms.

13. Provide a summary of the bidding/Request for Proposal process for gas supply during the review period, providing the original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, the evaluation process that led to the selection of a supplier, and any written procedures that exist for this activity.

14. Provide a copy of BREC's most recent gas supply plan and a written description of its gas supply planning and procurement process.

15. Provide a narrative description of any fuel supply-planning computer models currently being used by BREC or being considered for future use.

16. Provide organizational charts of the fuel planning, fuel purchasing, and fuel operations functions. Describe any changes that have occurred in the fuel planning and purchasing, and fuel operations organizations during the review period, and whether any further changes are contemplated.

17. Provide copies of reports or internal audits or reviews of any aspect of the supply function conducted within the last five years. Include reports prepared by BREC or outside auditors.

Justin McNeil RP

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DATED NOV 12 2026

cc: Parties of Record

Service List for Case 2026-00276

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* Denotes served by Email