



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matters of:

ELECTRONIC REVIEW OF THE ADEQUACY)	Administrative
OF KENTUCKY'S GENERATION CAPACITY)	Case No.
AND TRANSMISSION SYSTEM)	2000-00387

**SUPPLEMENTAL INFORMATION PROVIDED WITH
BIG RIVERS' ANNUAL FINANCIAL AND STATISTICAL REPORT
PURSUANT TO ADMINISTRATIVE CASE NO. 2000-00387**

FILED: February 28, 2025

BIG RIVERS ELECTRIC CORPORATION

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ELECTRONIC REVIEW OF THE ADEQUACY OF KENTUCKY'S
GENERATION CAPACITY AND TRANSMISSION SYSTEM**

**Response to Commission Staff's Information Request
as set forth in
Appendix G of the Commission's Order dated December 20, 2001**

February 28, 2025

1 **Item 1)** *Actual and weather-normalized energy sales for the just*
2 *completed calendar year. Sales should be disaggregated into native load*
3 *sales and off-system sales. Off-system sales should be further disaggregated*
4 *into full requirements sales, firm capacity sales, and non-firm or economy*
5 *energy sales. Off-system sales should be further disaggregated to identify*
6 *separately all sales where the utility acts as a reseller, or transporter, in a*
7 *power transaction between two or more other parties.*

8

9 **Response)** The information originally requested in the above item of Appendix G of
10 the Commission's Order dated December 20, 2001, in Administrative Case No. 2000-
11 00387, ("the December 2001 Order in Admin. Case 387") is no longer required
12 pursuant to Ordering Paragraph No. 5 of the Commission's Order dated March 29,
13 2004, amending the December 2001 Order in Admin. Case 387.

14

15 **Respondent)** Terry Wright, Jr.

16

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1 **Item 2)** *A summary of monthly power purchases for the just completed*
2 *calendar year. Purchases should be disaggregated into firm capacity*
3 *purchases required to serve native load, economy energy purchases, and*
4 *purchases where the utility acts as a reseller, or transporter, in a power*
5 *transaction between two or more other parties.*

6

7 **Response)** The information originally requested in the above item of Appendix G of
8 the December 2001 Order in Admin. Case 387 is no longer required pursuant to
9 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
10 amending the December 2001 Order in Admin. Case 387.

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1 **Item 3)** *Actual and weather-normalized monthly coincident peak*
2 *demands for the just completed calendar year. Demands should be*
3 *disaggregated into*

4 *a. native load demand (firm and non-firm) and*

5 *b. off-system demand (firm and non-firm).*

6

7 **Response)** The attached Table 3-G shows the actual and weather normalized native
8 load demand and the off-system coincident demand for 2024. Native load is
9 comprised of the Big Rivers' Members' rural and industrial load served under LIC,
10 LICSS, and LICX tariffs. Big Rivers sells its power into the Midcontinent
11 Independent System Operator, Inc. ("MISO") market and, therefore, the off-system
12 sales cannot be weather normalized. Off-system demand is comprised of three
13 components: (i) forward bilateral sales which are characterized as firm, (ii) sales to
14 Nebraska customers which are served in the SPP market and can be characterized
15 as firm, and (iii) off-system sales due to generation clearing in the MISO market

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1 which is in excess of Big Rivers' load and are a result of Big Rivers' compliance with
2 its MISO tariff obligations.

3

4

5 **Respondent)** Terry Wright, Jr.

6

**Big Rivers Electric Corporation
Administrative Case No. 387
Table 3-G
Native Peak and Off-System Sales
Weather Normalized**

**Total Native Load and Off-System Coincident Peak Demands ¹ (MW)
Filed February 28, 2025**

Month	Peak Date	Native Load ¹		Firm ³	Off-System Sales		
		All Firm Peak Demand ²			Off-System Demand		
		Actual	Weather Normalized		Sales to MISO ⁴	Sales in SPP ⁵	Non-Firm
Jan-24	01/20/24	758	730	198	0	73	0
Feb-24	02/01/24	645	722	165	0	48	0
Mar-24	03/18/24	607	630	194	0	37	0
Apr-24	04/17/24	574	573	196	390	43	0
May-24	05/02/24	629	634	255	286	31	0
Jun-24	06/20/24	699	707	236	198	31	0
Jul-24	07/14/24	744	754	233	173	60	0
Aug-24	08/06/24	778	789	253	1	52	0
Sep-24	09/05/24	745	738	250	33	50	0
Oct-24	10/06/24	649	644	223	0	36	0
Nov-24	11/26/24	590	618	188	0	36	0
Dec-24	12/03/24	722	760	204	0	40	0

Notes -

- 1.- Native Load includes Transmission Losses.
- 2.- Native Load includes Block Mining, Inc.'s full load. Pursuant to the Retail Sales Agreement only a portion of that load is served at Big Rivers' LIC tariff and the remaining is served at Market Rate with the costs passed through to the customer.
- 3.- Off System Firm Sales are Pre-arranged bilateral sales.
- 4.- Net Sales at generator nodes
- 5.- Off System Sales to Nebraska customers in SPP at Big Rivers' peak hour

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1 **Item 4)** *Load shape curves that show actual peak demands and weather-*
2 *normalized peak demands (native load demand and total demand) on a*
3 *monthly basis for the just completed calendar year.*

4

5 **Response)** The attached Graph 4-G shows the monthly native load demand, along
6 with the monthly weather normalized native load demand for 2024.

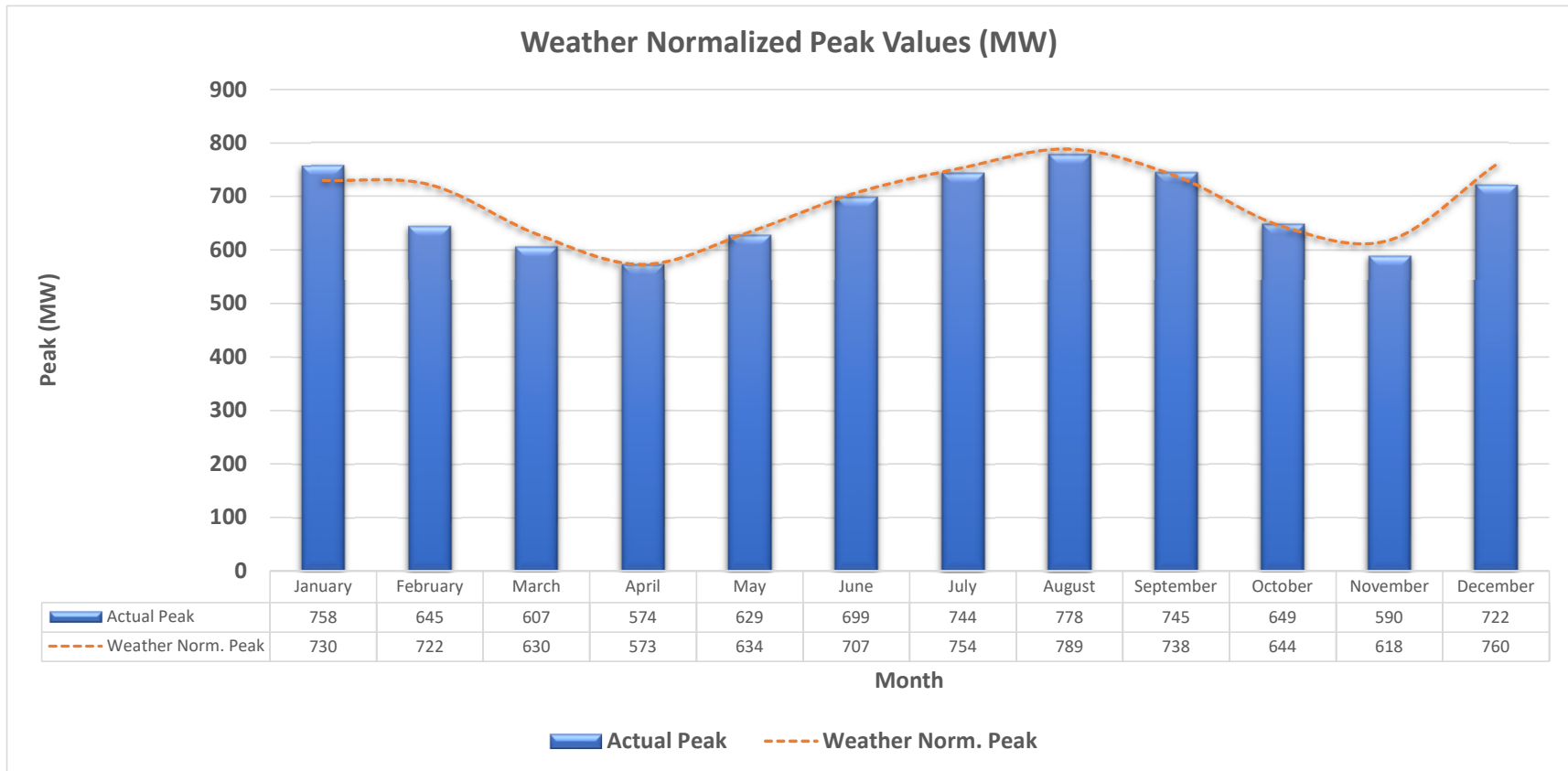
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8

9 **Respondent)** Terry Wright, Jr.

10

Big Rivers Electric Corporation
Administrative Case No. 387
Graph 4-G
Actual versus Weather Normalized Peak Demand
Filed February 28, 2025



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1 **Item 5)** *Load shape curves showing the number of hours that native load*
2 *demand exceeded these levels during the just complete calendar year:*

3 *a. 70% of the sum of installed generating capacity plus firm capacity*
4 *purchases;*

5 *b. 80% of the sum of installed generating capacity plus firm capacity*
6 *purchases;*

7 *c. 90% of the sum of installed generating capacity plus firm capacity*
8 *purchases.*

9

10 **Response)** The information originally requested in the above item of Appendix G of
11 the December 2001 Order in Admin. Case 387 is no longer required pursuant to
12 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
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1 **Item 6)** *Based on the most recent demand forecast, the base case demand*
2 *and energy forecasts and high case demand and energy forecasts for the*
3 *current year and the following four years. The information should be*
4 *disaggregated into*

5 *a. Native load (firm and non-firm demand) and*

6 *b. Off-system load (both firm and non-firm demand).*

7

8 **Response)** The attached Table 6-G tabulates the forecasted base case and high case
9 demand and energy in the associated demand breakdowns as requested.

10

11

12 **Respondent)** Terry Wright, Jr.

13

Big Rivers Electric Corporation
Administrative Case No. 2000-00387
Table 6-G
Total Native Load and Off-System Loads
Base and High Case Forecasts
Filed February 28, 2025

	Native Load ¹				Off-System Load Demand ⁴			
	Base Case ²		High Case ³		Base Case		High Case	
	Demand (MW)	Energy (MWH)	Demand (MW)	Energy (MWH)	Firm Demand (MW)	Non-Firm Demand (MW)	Firm Demand (MW)	Non-Firm Demand (MW)
2025	726.0	4,058,898	790.1	4,214,779	252.4	0	252.4	0
2026	727.9	4,155,970	791.5	4,311,035	252.4	0	252.4	0
2027	729.8	4,165,545	793.0	4,319,865	100	0	100.0	0
2028	732.0	4,177,398	794.9	4,331,003	100	0	100.0	0
2029	733.1	4,181,179	795.7	4,334,256	0.0	0	0.0	0

Notes and Assumptions

- 1 Native Load includes Block Mining, Inc.'s full load. Pursuant to the Retail Sales Agreement only a portion of that load is served at Big Rivers' LIC tariff and the remaining is served at Market Rate with the costs passed through to the customer.
- 2 Native Base Case:
 - Demand is the Coincident Peak without Transmission Losses
 - Demand is Big Rivers' forecasted peak coincident with MISO (MISO Requirement)
 - Demand is for Peak Demand Period, which is currently the Summer Period.
- 3 Native High Case:
 - Native High case represents the Extreme Weather Scenario from 2023 Long Term Load Forecast adjusted for changes in Industrial load
 - Native High case Off-System Firm Demand (MW) same as Base Case
- 4 Firm Off-System Load Demand consists of executed long term sales of KYMEA, OMU, and Executed Net Bilateral Capacity Transactions.

Excess generation sales to MISO are not projected as they will be contingent upon unit availability at time of system peak and can vary significantly.

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1 **Item 7)** *The target reserve margin currently used for planning purposes,*
2 *stated as a percentage of demand. If changed from what was in use in 2001,*
3 *include a detailed explanation for the change.*

4

5 **Response)** MISO's seasonal construct, case number ER22-495-000 filed by MISO in
6 November, 2021 and accepted by FERC in September 2022, introduced seasonal
7 requirements to the Planning Resource Auction ("PRA") to account for the unique risk
8 profile of each season.

9 The current summer target reserve margin used for planning purposes is
10 15.7% based on Installed Capacity ("ICAP")¹ Ratings of resources, and 7.9% based on
11 Unforced Capacity ("UCAP")² Ratings, as specified by MISO for the upcoming
12 planning year effective June 1, 2025. MISO annually determines seasonal minimum
13 Planning Reserve Margin ("PRM") that would result in the MISO system

¹ ICAP represents physical generating capacity adjusted for ambient weather conditions (high level definition)

² UCAP represents the percentage of ICAP available after a unit's forced outage rate is taken into account (high level definition).

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1 experiencing annually a less than one-day loss-of-load event (“LOLE”) every 10 years,
2 per the MISO Tariff. To determine the LOLE targets for each season that will be
3 used to calculate the PRM and Local Reliability Requirements (“LRR”), MISO
4 followed the process first solving the LOLE model to an annual value of 0.1 and then
5 checking the seasonal distribution. If a season had an LOLE value of at least 0.01,
6 then its target would be set to that LOLE. If a season had less than 0.01 LOLE,
7 additional analysis was performed until the target of 0.01 LOLE was met. Big Rivers
8 is located in MISO Local Resource Zone 6, and the seasonal LOLE targets determined
9 in the Planning Year 2025-2026 LOLE study are shown in Table 3-11, below:

Region	Summer	Fall	Winter	Spring
MISO-wide	0.10	0.01	0.01	0.01
LRZ 1	0.099	0.01	0.01	0.01
LRZ 2	0.091	0.01	0.01	0.01
LRZ 3	0.098	0.01	0.01	0.01
LRZ 4	0.01	0.01	0.10	0.01
LRZ 5	0.01	0.01	0.094	0.01
LRZ 6	0.091	0.01	0.01	0.01
LRZ 7	0.099	0.01	0.01	0.01
LRZ 8	0.01	0.01	0.093	0.01
LRZ 9	0.026	0.047	0.02	0.01
LRZ 10	0.069	0.015	0.01	0.012

Table 3-11: Planning Year 2025-2026 Seasonal LOLE Distribution

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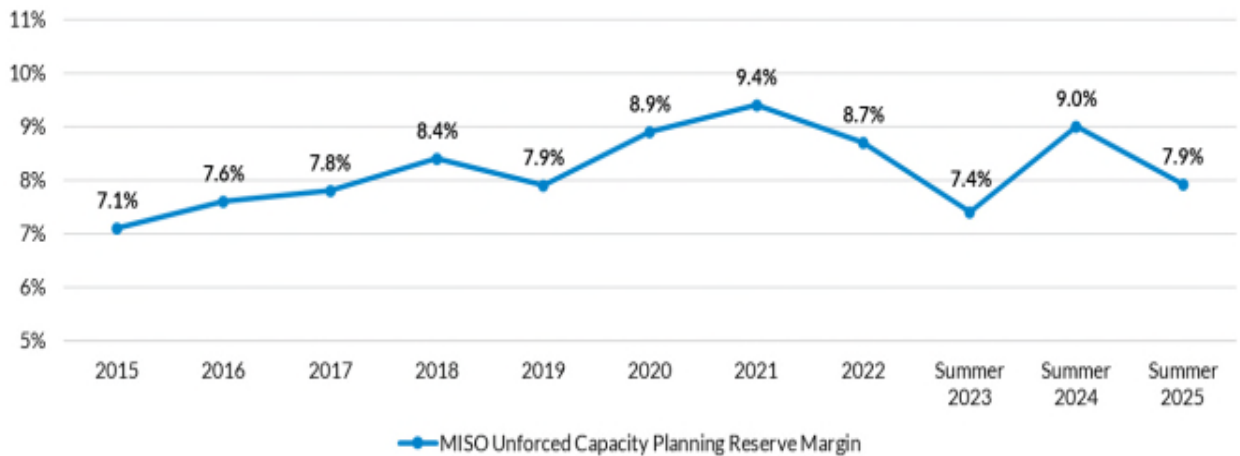
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1 The Planning Reserve margin changes over time, and its history is shown in
2 Figure 1-1 reproduced below, which is from MISO 2025–2026 Loss of Load
3 Expectation Study Report. *The link to MISO's 2025-2026 LOLE Report is:*
4 <https://cdn.misoenergy.org/PY%202025-2026%20LOLE%20Study%20Report662942.pdf>
5

6
7 **Figure 1-1 Comparison of UCAP PRM Targets Across 10 Years³**



8
9 **Respondent)** Terry Wright, Jr.

³ Figure 1-1 compares the PRM UCAP values over the last 10 Planning Years. The last endpoint shows the Planning Year 2024-2025 Summer PRM value.

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1 **Item 8)** *Projected reserve margins stated in megawatts and as a*
2 *percentage of demand for the current year and the following four years.*
3 *Identify projected deficits and current plans for addressing these. For each*
4 *year identify the level of firm capacity purchases projected to meet native*
5 *load demand.*

6

7 **Response)** Please see Table 1, below. Reserve Margin MWs are calculated as
8 summer seasonally accredited capacity ("SAC") of available resources minus Base
9 Demand and net Firm Capacity Sales.

10 Big Rivers will make bilateral capacity purchases or participate in the annual
11 MISO Planning Resource Auction to alleviate any shortages and will meet the MISO
12 Planning Reserve Margin Requirements including transmission losses.

13

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1

Table 1						
Year	Reserve Margin (Summer SAC MW)¹	Reserve Margin (%)	MISO Reserve Margin Requirement² (UCAP%)	Firm Capacity Purchases³ (MW)	Projected Purchases⁴ (MW)	Projected Deficit (MW)
2025	69	10.2%	10.6%	178		0
2026	27	4.0%	10.6%	178		0
2027	175	25.5%	10.6%	178		0
2028	170	24.7%	10.6%	178		0
2029	266	38.7%	10.6%	178		0

2

3

4 **Respondent)** Terry Wright, Jr.

¹ Reserve Margin includes BREC Tariff Load, EDR Load, and Off-System Contracts (No Nebraska) less 2025 SAC Accreditation Values. It does not include Industrial Load served at Market Rates as these costs are passed through to the Load Customer. It does not include Transmission Losses or MISO Planning Reserve Margin Requirements.

² MISO Reserve Margin Requirement includes Transmission Losses. PRMR remains at 2025 levels for future years.

³ Southeastern Power Administration ("SEPA") Cumberland Hydropower allocation at 2025 accredited capacity.

⁴ Projected Purchases in MISO Annual Planning Reserve Market to Meet PRMR.

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1 **Item 9)** *By date and hour, identify all incidents during the just completed*
2 *calendar year when reserve margin was less than the East Central Area*
3 *Reliability Council's ("ECAR") 1.5% spinning reserve requirement. Include*
4 *the amount of capacity resources that were available, the actual demand on*
5 *the system, and the reserve margin, stated in megawatts and as a percentage*
6 *of demand. Also, identify system conditions at the time.*

7

8 **Response)** The information originally requested in the above item of Appendix G of
9 the December 2001 Order in Admin. Case 387 is no longer required pursuant to
10 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
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14 **Respondent)** Terry Wright, Jr.

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1 **Item 10)** *A list identifying and describing all forced outages in excess of*
2 *two hours in duration during the just completed calendar year.*

3

4 **Response)** The information originally requested in the above item of Appendix G of
5 the December 2001 Order in Admin. Case 387 is no longer required pursuant to
6 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
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10 **Respondent)** Jeffrey S. Brown

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1 **Item 11)** *A list that identifies scheduled outages or retirements of*
2 *generating capacity during the current year and the following four years.*

3

4 **Response)** The planned maintenance outage schedule for 2025 through 2029 is
5 being filed with a Motion for Confidential Treatment. The schedule is regularly
6 modified based on actual operating conditions, forced outages, changes in the
7 schedule required to meet environmental regulation compliance, fluctuation in
8 wholesale capacity and energy prices, and other unforeseen events that may affect
9 unit reliability or generation capacity. The scheduled outages are listed in the tables
10 which follow.

11

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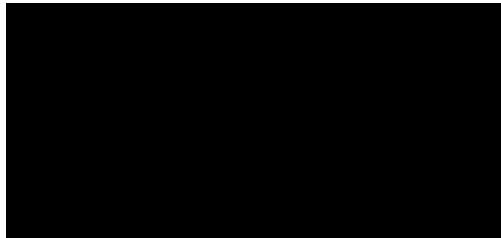
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1 **Wilson Unit 1**

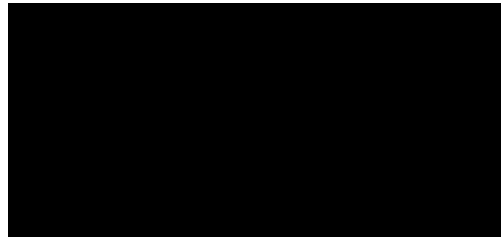
2025
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3 **Green Unit 1**

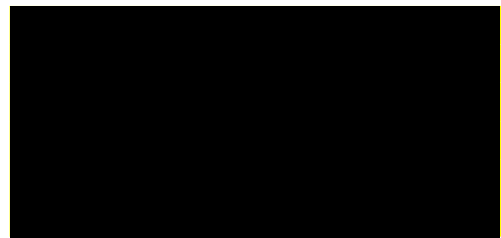
2025
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5 **Green Unit 2**

2025
2026
2027
2028
2029



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7 Respondent) Jeffrey S. Brown

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1 **Item 12)** *Identify all planned base load or peaking capacity additions to*
2 *meet native load requirements over the next 10 years. Show the expected in-*
3 *service date, size, and site for all planned additions. Include additions*
4 *planned by the utility, as well as those by affiliates, if constructed in*
5 *Kentucky or intended to meet load in Kentucky.*

6

7 **Response)** In Case No. 2022-00296,⁸ Big Rivers sought and received Commission
8 approval of an amendment to a solar purchase power agreement, the “Unbridled
9 PPA,” that was originally approved in Case No. 2020-00183.⁹ The Unbridled Solar
10 160 MW facility in Henderson County, began its operations in the first quarter of
11 2025.

12 The base case from Big Rivers' 2023 Integrated Resource Plan (“IRP”)
13 included the addition of a 635 MW natural gas combined cycle generator, which

⁸ *In the Matter of: Electronic Application of Big Rivers Electric Corporation for Approval of Amendment to Power Purchase Agreement*, P.S.C. Case No. 2022-00296, Order (June 13, 2023).

⁹ *In the Matter of: Electronic Application of Big Rivers Electric Corporation for Approval of Solar Power Contracts*, P.S.C. Case No. 2020-00183, Order (Sept. 28, 2020).

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1 would be located near Big Rivers' existing Sebree plant location.¹⁰ If this facility
2 were to get built, it would likely be completed sometime between 2029 and 2032.
3 However, since the conclusion of the 2023 IRP proceeding, Big Rivers is taking a
4 fresh look at our next resource, and Big Rivers' analysis to determine our future
5 resource needs is underway. Big Rivers will submit to the Commission any
6 required requests for approval at the appropriate time.

7

8

9 **Respondent)** Terry Wright, Jr.

¹⁰ *Id.* at page 142.

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1 **Item 13)** *The following transmission energy data for the just completed*
2 *calendar year and the forecast for the current year and the following four*
3 *years:*

4 *a. Total energy received from all interconnections and generation*
5 *sources connected to the transmission system;*

6 *b. Total energy delivered to all interconnections on the transmission*
7 *system;*

8 *c. Peak load capacity of the transmission system; and*

9 *d. Peak demand for summer and winter seasons on the transmission*
10 *system.*

11

BIG RIVERS ELECTRIC CORPORATION

**SUPPLEMENTAL INFORMATION PROVIDED WITH
BIG RIVERS' ANNUAL FINANCIAL AND STATISTICAL REPORT
PURSUANT TO ADMINISTRATIVE CASE NO. 2000-00387 –
ELECTRONIC REVIEW OF THE ADEQUACY OF KENTUCKY'S
GENERATION CAPACITY AND TRANSMISSION SYSTEM**

**Response to Commission Staff's Information Request
as set forth in
Appendix G of the Commission's Order dated December 20, 2001**

February 28, 2025

1 **Response)**

2 a.

Transmission System Energy Received (MWh)

	<u>Generation</u>	<u>Interconnections</u>	<u>Total</u>
2024	3,094,328	10,724,097	13,818,425

Projected System Energy Received (MWh)

2025	14,993,829
2026	15,383,825
2027	16,683,825
2028	16,683,825
2029	16,683,825

3

4 b.

Transmission System Energy Delivered at Interconnections
(MWh)

	<u>Total</u>
2024	6,208,460

Projected System Energy Delivered at Interconnection
(MWh)

2025	6,680,492
2026	6,454,472
2027	5,298,140
2028	5,298,140
2029	5,298,140

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1

2 c.

Transmission Peak Capacity (MW)

2024 2,903

Projected Transmission Peak Capacity (MW)

2025 2,903

2026 2,943

2027 3,093

2028 3,093

2029 3,093

3

4 d.

Transmission System Peak Demand (MW)

	<u>Winter</u>	<u>Summer</u>
2024	1,275	1,285

Projected System Peak Demand (MW)

	<u>Winter</u>	<u>Summer</u>
2025	1,272	1,289
2026	1,331	1,349
2027	1,473	1,491
2028	1,473	1,494
2029	1,476	1,495

5

6 Respondent) Jeffrey K. Fulkerson

BIG RIVERS ELECTRIC CORPORATION

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ELECTRONIC REVIEW OF THE ADEQUACY OF KENTUCKY'S
GENERATION CAPACITY AND TRANSMISSION SYSTEM**

**Response to Commission Staff's Information Request
as set forth in
Appendix G of the Commission's Order dated December 20, 2001**

February 28, 2025

1 **Item 14)** *Identify all planned transmission capacity additions for the next*
2 *ten years. Include the expected in-service date, size and site for all planned*
3 *additions and identify the transmission need each addition is intended to*
4 *address.*

5

6 **Response)** A confidential listing of Big Rivers' planned Transmission Capacity
7 Additions for 2025 through 2034 is being filed with a Motion for Confidential
8 Treatment.

9

10

11 **Respondent)** Jeffrey K. Fulkerson

12



In the Matter of:

A REVIEW OF THE ADEQUACY OF)	Administrative
KENTUCKY'S GENERATION CAPACITY)	Case No.
AND TRANSMISSION SYSTEM)	2000-00387

**SUPPLEMENTAL INFORMATION PROVIDED WITH
BIG RIVERS' ANNUAL FINANCIAL AND STATISTICAL REPORT
PURSUANT TO ADMINISTRATIVE CASE NO. 2000-00387**

CONFIDENTIAL RESPONSE

**Attachment to Item 14 of the
Commission Staff's Information Request
as set forth in Appendix G of the
Commission's Order dated December 20, 2001
FILED: February 28, 2025**

**INFORMATION FILED WITH
MOTION FOR CONFIDENTIAL TREATMENT**

BIG RIVERS ELECTRIC CORPORATION

**SUPPLEMENTAL INFORMATION PROVIDED WITH
BIG RIVERS' ANNUAL FINANCIAL AND STATISTICAL REPORT
PURSUANT TO ADMINISTRATIVE CASE NO. 2000-00387 –
A REVIEW OF THE ADEQUACY OF KENTUCKY'S GENERATION
CAPACITY AND TRANSMISSION SYSTEM**

**Response to Commission Staff's Information Request
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Appendix G of the Commission's Order dated December 20, 2001**

February 28, 2025

1 **Supplemental Item 1)** *Provide a detailed discussion of the consideration*
2 *given to price elasticity in the forecasted demand, energy, and reserve margin*
3 *information above.*

4

5 **Response)** The information originally requested by letter dated May 13, 2013, in
6 Admin. Case 387 is no longer required pursuant to Ordering Paragraph No. 2 of the
7 Commission's Order dated April 8, 2022, relieving the parties from the annual price
8 elasticity reporting requirement.

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11 **Respondent)** Terry Wright, Jr.

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