

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

THE APPLICATION OF THOROUGHbred)	
GENERATING COMPANY, LLC FOR A MERCHANT)	CASE NO.
POWER PLANT CONSTRUCTION CERTIFICATE)	2002-00150
IN MUHLENBERG, COUNTY, KY)	

**THOROUGHbred GENERATING COMPANY, LLC'S
DATA REQUESTS TO BIG RIVERS ELECTRIC CORPORATION**

Applicant, Thoroughbred Generating Company, LLC (“Thoroughbred”), pursuant to 807 KAR 5:001, submits the following Data Requests to Big Rivers Electric Corporation (“BREC”). Thoroughbred’s requests for the information herein arise as the result of matters testified to in the pre-filed direct testimony of BREC witness, Mick Durham, filed on Monday, October 6, 2003.

Thoroughbred requests that responses to these data requests be served by facsimile or electronic mail, with copies of any and all requested modeling results served by overnight delivery, on or before Friday, October 17, 2003. In responding to each data request, Thoroughbred requests that the name of the person or persons who will be responsible for responding to questions relating to the information be provided.

DATA REQUESTS

1. Has a permit application been submitted to the Kentucky Division for Air Quality for the addition of a second generating unit at the D.B. Wilson facility (“Wilson 2”)? If so, please state when the application was submitted and state the status of review of the application by the Division. Please provide a copy of the application and of the documentation for the annual

emissions proposed for Wilson 2 of mercury, SO₂, PM_{2.5}, PM₁₀, total particulate, and NO_x?

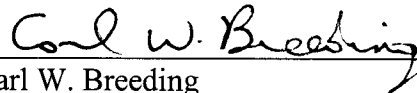
What is the hourly emission rate for each of these pollutants?

2. Has BREC, or any person or entity acting for or on behalf of BREC, performed any air quality modeling of the emissions of fine particulate (PM_{2.5}), sulfur dioxide (SO₂), and/or nitrogen oxides (NO_x) from the existing generation unit at D.B. Wilson ("Wilson 1"), of the emissions anticipated from an additional unit at D.B. Wilson ("Wilson 2"), and/or anticipated from the proposed Thoroughbred Generating Station? If so, what models have been run, on what date(s) were such models run, and what meteorological data sets were utilized in connection therewith? Thoroughbred requests a copy of modeling output and input files responsive to this request.
3. What are annual emissions (tons) from the D.B. Wilson facility of mercury, SO₂, PM_{2.5}, PM₁₀, total particulate, and NO_x? What is the hourly emission rate for each of these pollutants? What is the heat input (MBtu/hr) to Wilson 1 on an annual and hourly basis consistent with the emissions data that are responsive to the foregoing questions? What is the percentage reduction attained by each control device for these emissions?
4. When was the modeling protocol for proposed Wilson 2's effects on class I areas submitted to the Federal Land Manager for review?
5. Under the NO_x SIP Call, as implemented by the Kentucky Division for Air Quality, are reductions in NO_x emissions planned or anticipated for the D.B. Wilson facility? For the 2004 to 2006 allocation period, what level of allowances has been allocated to the D.B. Wilson facility and will additional allowances be needed to operate that facility in that period?
6. Under the Clean Air Act Title IV Acid Rain program, has the D.B. Wilson facility taken any steps to reduce its SO₂ emissions or are any such reductions planned for the D.B. Wilson facility

for Phase 2? What allowances are currently held for the D.B. Wilson facility?

7. Is the D.B. Wilson facility Best Available Retrofit Technology (“BART”) eligible under EPA’s Regional Haze rule? If not, why not? When did Wilson I begin operations? When was construction on Wilson I begun?
8. Does BREC hold a water withdrawal permit for its D.B. Wilson facility? If so, what is the permitted water withdrawal rate for the facility and what restrictions are imposed during low flow conditions? Under such permit, what flow rate constitutes low flow at the D.B. Wilson facility withdrawal point for purposes of triggering restrictions on the withdrawal rate? If BREC does not hold a water withdrawal permit for its D.B. Wilson facility, what is water withdrawal rate for the facility?

Respectfully submitted,



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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the forgoing was sent by United States First Class Mail, sufficient postage prepaid, to the following this the 10 day of October, 2003.

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