

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

APPLICATION OF BIG RIVERS)	
ELECTRIC CORPORATION FOR)	CASE NO. 2019-00269
ENFORCEMENT OF RATE AND)	
SERVICE STANDARDS)	

**CITY OF HENDERSON, KENTUCKY, AND HENDERSON UTILITY COMMISSION,
d/b/a HENDERSON MUNICIPAL POWER & LIGHT’S POST-HEARING REQUEST
FOR INFORMATION TO BIG RIVERS ELECTRIC CORPORATION**

The City of Henderson, Kentucky, and the Henderson Utility Commission, d/b/a Henderson Municipal Power & Light (jointly “Henderson”), in accordance with the Commission’s Order dated October 22, 2020, hereby submits the following post-hearing data requests to Applicant Big Rivers Electric Corp. (“Big Rivers”):

GENERAL INSTRUCTIONS

1. These requests shall be deemed continuing in nature so as to require further and supplemental responses in the event Applicant receives or generates additional information within the scope of these requests following submission of Applicant’s initial response.
2. If any request appears to be confusing, please request clarification directly from the undersigned.
3. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.
4. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self-evident to a person not familiar with the printout.

5. If Applicant has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned as quickly as possible.

6. For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom the document was distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

7. In the event any document called for has been destroyed or transferred beyond the control of Applicant, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

8. To the extent that a request calls for information not available for all categories or all period of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

POST-HEARING DATA REQUESTS

1. Please provide copies of any and all communications exchanged between Big Rivers and the Energy & Environment Cabinet referencing the ownership of Station Two within the context of the Green Station Title V air emission permit. Include copies of all applications, documents, or other writings filed with the Division of Air Quality.

2. Pursuant to the hearing testimony of Mike Pullen at 11:00'00, in which Mr. Pullen updated his written testimony and Big Rivers' response to Henderson data request 1-63, please provide Big Rivers' revised calculations reflecting the total tonnage of waste ever deposited into the Green Landfill, the total number of tons attributable to Station Two, and the total number of Station Two tons attributable to Henderson. Include in your calculations the percentage of total waste you contend is attributable to Henderson for purposes of calculating the percentage of Green Landfill

decommissioning costs you expect Henderson to pay.

Respectfully submitted,

/s/ John N. Hughes

JOHN N. HUGHES
ATTORNEY AT LAW
Professional Service Corporation
124 West Todd Street
Frankfort, Kentucky 40601
Telephone: (502) 227-7270
jnhughes@johnnhughespsc.com

and

/s/ H. Randall Redding

H. RANDALL REDDING
SHARON W. FARMER
KING, DEEP & BRANAMAN
127 North Main Street
P.O. Box 43
Henderson, Kentucky 42419-0043
Telephone: (270) 827-1852
rredding@kdblaw.com
sfarmer@kdblaw.com

*Attorneys for Henderson Utility Commission, d/b/a
Henderson Municipal Power & Light*

/s/ Dawn Kelsey

DAWN KELSEY
CITY ATTORNEY
CITY OF HENDERSON
222 First Street
Henderson, Kentucky 42420
Attorney for City of Henderson