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October 18, 2022

VIA ELECTRONIC MAIL

Ms. Linda C. Bridwell
Executive Director
Public Service Commission
211 Sower Boulevard, P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: *In the Matter of: Electronic Application of Big Rivers Electric Corporation for Approval of its 2020 Environmental Compliance Plan, Authority to Recover Costs Through a Revised Environmental Surcharge and Tariff, the Issuance of a Certificate of Public Convenience and Necessity for Certain Projects, and Appropriate Accounting and Other Relief – Case No. 2019-00435*

Dear Ms. Bridwell:

Ordering Paragraph No. 18 of the Commission’s Order dated August 6, 2020, in Case No. 2019-00435, directs Big Rivers Electric Corporation (“*Big Rivers*”) to file “the plans, drawings, and specifications for Projects 12, 13-1, and 13-2 within seven days upon the date of the completion and finalization of those plans, drawings, and specifications.” Big Rivers hereby files in regards to Project 13-1 these documents.

As Big Rivers emphasized in Case No. 2019-00435 Big Rivers and other coal-based electric generators face a complicated and ever-changing regulatory landscape that requires constant planning, analysis and adaptation.¹ The Commission acknowledged the Big Rivers was unable to provide the final project plans, drawings, and specifications during the proceeding and granted the Company’s Motion for a Deviation from 807 KAR 5:001, Section 15(2)(d)(2). Due to Big Rivers’ continuing obligation to monitor and evaluate the applicable environmental requirements the scope of Project 13-1 was modified.

The conditions of closing the Green Ash Pond (the 2020 ECP Project 13-1) were based on the November 2019 Burns and McDonnell Engineering Company, Inc. (“Burns and

¹ See Big Rivers’ Application at 13 (Feb. 7, 2020).

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McDonnell') report. The basis of the report was converting Green to dry ash handling system. As explained fully in Case No. 2022-00079,² Green Station's two coal-fired units were converted to natural gas fired units. The scope of Project 13-1 was modified as reflected in the enclosed June 20, 2022, Burns & McDonnell Engineering Company, Inc. report to complete the Green Station ash pond closure by October 31, 2023. The attached plans have received the necessary environmental approvals and so are finalized plans, as required by the Commission's August 6, 2020 Order in this matter.

Since the collective size of these documents is large, Big Rivers is providing them through a secure file share site.

The Commission has excused no parties to this proceeding from its electronic filing procedures.

Please feel free to contact me should you have any questions regarding this filing.

Sincerely yours,

/s/ Senthia Santana

Senthia Santana

Associate Attorney

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² See, *In the Matter of: Electronic Application of Big Rivers Electric Corporation for a Certificate of Public Convenience and Necessity Authorizing the Conversion of the Green Station Units to Natural Gas-Fired Units and an Order Approving the Establishment of a Regulatory Asset*, P.S.C. Case No. 2021-00079.

