

**ORIGINAL**



Your Touchstone Energy® Cooperative 

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

**In the Matter of:**

<b>AN ELECTRONIC EXAMINATION OF THE</b>	)	
<b>APPLICATION OF THE FUEL ADJUSTMENT</b>	)	
<b>CLAUSE OF BIG RIVERS ELECTRIC</b>	)	<b>Case No.</b>
<b>CORPORATION FROM NOVEMBER 1, 2019</b>	)	<b>2020-00250</b>
<b>THROUGH APRIL 30, 2020</b>	)	

**Responses to Commission's Request for Information  
dated  
August 19, 2020**

**FILED: September 2, 2020**

**ORIGINAL**

**BIG RIVERS ELECTRIC CORPORATION**  
**AN ELECTRONIC EXAMINATION OF**  
**THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE**  
**OF BIG RIVERS ELECTRIC CORPORATION**  
**FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020**  
**CASE NO. 2020-00250**

**VERIFICATION**

I, Mark W. McAdams, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

*Mark W. McAdams*

\_\_\_\_\_  
Mark W. McAdams

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

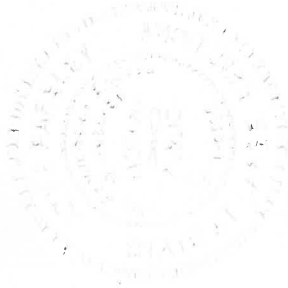
  1st   SUBSCRIBED AND SWORN TO before me by Mark W. McAdams on this the  
day of September, 2020.

*Joy P. Parsley*

\_\_\_\_\_  
Notary Public, Kentucky State at Large

My Commission Expires \_\_\_\_\_

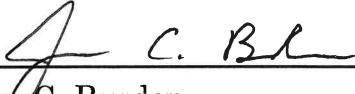
Notary Public, Kentucky State-At-Large  
My Commission Expires: July 10, 2022  
ID: 604480



**BIG RIVERS ELECTRIC CORPORATION**  
**AN ELECTRONIC EXAMINATION OF**  
**THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE**  
**OF BIG RIVERS ELECTRIC CORPORATION**  
**FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020**  
**CASE NO. 2020-00250**

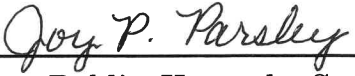
**VERIFICATION**

I, Jason C. Burden, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
\_\_\_\_\_  
Jason C. Burden

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

1<sup>ST</sup> SUBSCRIBED AND SWORN TO before me by Jason C. Burden on this the  
day of September, 2020.

  
\_\_\_\_\_  
Notary Public, Kentucky State at Large  
My Commission Expires \_\_\_\_\_

Notary Public, Kentucky State-At-Large  
My Commission Expires: July 10, 2022  
ID: 604480

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF  
THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE  
OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**VERIFICATION**

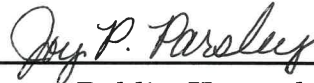
I, Ronald D. (Ron) Gregory, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



\_\_\_\_\_  
Ronald D. (Ron) Gregory

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

SUBSCRIBED AND SWORN TO before me by Ronald D. (Ron) Gregory on this  
the 1<sup>st</sup> day of September, 2020.



\_\_\_\_\_  
Notary Public, Kentucky State at Large

My Commission Expires \_\_\_\_\_

Notary Public, Kentucky State-At-Large  
My Commission Expires: July 10, 2022  
ID: 604480



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**VERIFICATION**

I, Natalie R. Hankins, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

*Natalie R. Hankins*

\_\_\_\_\_  
Natalie R. Hankins

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

1st SUBSCRIBED AND SWORN TO before me by Natalie R. Hankins on this the  
day of September, 2020.

*Joy P. Parsley*

\_\_\_\_\_  
Notary Public, Kentucky State at Large

My Commission Expires \_\_\_\_\_

Notary Public, Kentucky State-At-Large  
My Commission Expires: July 10, 2022  
ID: 604480

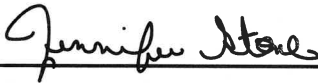


**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

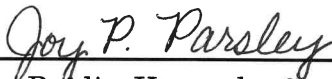
**VERIFICATION**

I, Jennifer M. Stone, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
\_\_\_\_\_  
Jennifer M. Stone

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

1<sup>st</sup> SUBSCRIBED AND SWORN TO before me by Jennifer M. Stone on this the  
day of September, 2020.

  
\_\_\_\_\_  
Notary Public, Kentucky State at Large  
My Commission Expires \_\_\_\_\_

Notary Public, Kentucky State-At-Large  
My Commission Expires: July 10, 2022  
ID: 604480



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 1)** *For the period under review, provide the amount of coal*  
2 *purchased in tons and the percentage of purchases that were spot versus*  
3 *contract.*

4

5 **Response)** Please see the schedules below.

6

**For the Period from November 1, 2019, through April 30, 2020**

<b>Purchase Vendor</b>	<b>Fuel Type</b>	<b>Purchase Tonnage</b>	<b>Contract Type</b>
Foresight Coal (BRE-15-005)	Coal	35,578.47	Contract
KenAmerican Resources (BRE-15-006)	Coal	64,700.67	Contract
Alliance Coal <sup>1</sup> (BRE-18-001A)	Coal	213,193.80	Contract
Alliance Coal (BRE-18-003)	Coal	153,233.80	Contract
WKY Consol. Resources (BRE-19-002)	Coal	224,385.90	Contract
Alliance Coal <sup>1</sup> (BRE-19-003A)	Coal	120,018.40	Contract
Alliance Coal (BRE-19-005)	Coal	125,582.59	Spot
WKY Consol. Resources (BRE-20-001)	Coal	34,877.11	Contract
<b>Total Tonnage</b>		<b>971,570.74</b>	

**For the Period from November 1, 2019, through April 30, 2020**

Percentage Spot Purchase Tons	3.59 %
Percentage Contract Purchase Tons	96.41 %
Percentage Total Purchase Tons	100.00 %

7

8

<sup>1</sup> Shown in prior Six-Month FAC reviews as Rhino/Pennyrile.

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Witness)** Mark W. McAdams

2



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 2)**      *For the period under review, list each coal purchase made under*  
2 *a long-term contract (one year or greater). For each purchase, list:*

3

4      *a. Contract or purchase order number;*

5      *b. The supplier's name;*

6      *c. The location(s) of production facilities from which the coal is*  
7      *sourced;*

8      *d. The method of delivery, (i.e., barge, truck, rail, other);*

9      *e. The actual quantity received during the review period;*

10      *f. The tonnage requirement for the review period; and*

11      *g. Current price paid per ton.*

12

13 **Response)** Please see the attached schedule

14

15

16 **Witness)** Mark W. McAdams

17

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Foresight Coal Supply Agreement**

A. CONTRACT NUMBER:	BRE-15-005		
B. SUPPLIER'S NAME / ADDRESS:	Foresight Coal Sales, LLC 46226 National Road St. Clairsville, OH 43950		
C. PRODUCTION FACILITY:	Shay No. 1 Mine, Macoupin County, Illinois; KenAmerican Paradise No. 9 Mine Western KY Consolidated Resources and Muhlenberg Coal Company's Genesis and Pride Mines Muhlenberg and Ohio Counties, Kentucky		
D. METHOD OF DELIVERY:	Barge and/or truck		
E. ACTUAL TONNAGE:	2015	–	200,318 Tons
	2016	–	239,969 Tons
	2017	–	239,421 Tons
	2018	–	240,151 Tons
	2019	–	240,166 Tons <i>(through December)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2015	–	200,000 Tons
	2016	–	240,000 Tons
	2017	–	240,000 Tons
	2018	–	240,000 Tons
	2019	–	240,000 Tons
PERCENT OF ANNUAL REQUIREMENTS:	2015	–	100.16 %
	2016	–	99.99 %
	2017	–	99.76 %
	2018	–	100.06 %
	2019	–	100.07 % <i>(through December)</i>
G. CURRENT PRICE <i>(Base)</i> :	2015	–	\$ 34.0006 per Ton
	2016	–	\$ 36.2491 per Ton
	2017	–	\$ 38.4998 per Ton
	2018	–	\$ 40.5497 per Ton
	2019	–	\$ 42.3490 per Ton
CURRENT PRICE <i>(Contract)</i> :	2015	–	\$ 34.0006 per Ton
	2016	–	\$ 36.2491 per Ton
	2017	–	\$ 38.4998 per Ton
	2018	–	\$ 40.5497 per Ton
	2019	–	\$ 42.3490 per Ton

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**KenAmerican Resources Coal Supply Agreement**

A. CONTRACT NUMBER:	BRE-15-006			
B. SUPPLIER'S NAME/ADDRESS:	KenAmerican Resources, Inc. 46226 National Road St. Clairsville, OH 43950			
C. PRODUCTION FACILITY:	Paradise #9 Mine Western Kentucky Consolidated Resources – Genesis Mine Muhlenberg County Coal Company – Pride Mine			
D. METHOD OF DELIVERY:	Truck			
E. ACTUAL TONNAGE:	2015	–	300,077	Tons
	2016	–	500,015	Tons
	2017	–	498,581	Tons
	2018	–	400,449	Tons
	2019	–	359,818	Tons <i>(through December)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2015	–	300,000	Tons
	2016	–	500,000	Tons
	2017	–	500,000	Tons
	2018	–	400,000	Tons
	2019	–	350,000 min. 400,000 max.	Tons
PERCENT OF ANNUAL REQUIREMENTS:	2015	–	100.03	%
	2016	–	100.00	%
	2017	–	99.72	%
	2018	–	100.11	%
	2019	–	90.84	% <i>(through December)</i> <sup>1</sup>

---

<sup>1</sup> Calculated based on 396,100 nominated tons for 2019. The parties mutually agreed to cease shipments at 90.84% of deliveries. This contract was Big Rivers' highest cost contract and the additional tonnage was not needed to support generation or inventory levels.

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**KenAmerican Resources Coal Supply Agreement (*continued*)**  
*(Contract Number – BRE-15-006)*

G. CURRENT PRICE ( <i>Base</i> ):	2015	–	\$ 49.2505	per Ton
	2016	–	\$ 50.5000	per Ton
	2017	–	\$ 51.7496	per Ton
	2018	–	\$ 53.0506	per Ton
	2019	–	\$ 54.4008	per Ton ( <i>Jan – Mar</i> )
			\$ 46.0260	per Ton ( <i>Apr – Dec</i> )
CURRENT PRICE ( <i>Contract</i> ):	2015	–	\$ 49.2505	per Ton
	2016	–	\$ 50.5000	per Ton
	2017	–	\$ 51.7496	per Ton
	2018	–	\$ 53.0506	per Ton
	2019	–	\$ 54.4008	per Ton ( <i>Jan – Mar</i> )
			\$ 46.0260	per Ton ( <i>Apr – Dec</i> )

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC and Pennyrile Energy LLC Coal Sales**

A. CONTRACT NUMBER:	BRE-18-001		
B. SUPPLIER'S NAME/ADDRESS:	Rhino Energy LLC/Pennyrile Energy, LLC. 424 Lewis Hargett Circle, Suite 250 Lexington, KY 40503		
C. PRODUCTION FACILITY:	Pennyrile Energy LLC Riveredge Mine McLean County, Kentucky		
D. METHOD OF DELIVERY:	Barge		
E. ACTUAL TONNAGE:	2018	-	350,000 Tons
	2019	-	342,466 Tons
	2020	-	97,744 Tons <i>(through April)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2018	-	350,000 Tons
	2019	-	150,000 min. Tons 350,000 max.
	2020	-	150,000 min. Tons 350,000 max.
PERCENT OF ANNUAL REQUIREMENTS:	2018	-	100.00 %
	2019	-	97.85 % <i>(through December)</i> <sup>2</sup>
	2020	-	47.11 % <i>(through April)</i> <sup>3</sup>
G. CURRENT PRICE ( <i>Base</i> ):	2018	-	\$ 37.5002 per Ton
	2019	-	\$ 38.6302 per Ton ( <i>Jan. - Aug.</i> )
<i>Assigned Price</i>	2019	-	\$ 36.2710 per Ton ( <i>Sept. - Dec.</i> )
<i>Assigned Price</i>	2020	-	\$ 37.4302 per Ton
CURRENT PRICE ( <i>Contract</i> ):	2018	-	\$ 37.5002 per Ton
	2019	-	\$ 38.6302 per Ton ( <i>Jan. - Aug.</i> )
<i>Assigned Price</i>	2019	-	\$ 36.2710 per Ton ( <i>Sept. - Dec.</i> )
<i>Assigned Price</i>	2020	-	\$ 37.4302 per Ton

<sup>2</sup> Calculated based on 350,000 ton maximum for 2019 per assignment. Assigned to Alliance Coal on September 6, 2019. Referenced following assignment as Rhino/Alliance (BRE-18-001A).

<sup>3</sup> Calculated based on 200,000 nominated tons for 2020 *plus* 7,534 tons carryover from 2019 equaling 207,534 tons. 97,744 tons *divided by* 207,534 tons = 47.11%.

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Sun Energy Group LLC**

A. CONTRACT NUMBER:	BRE-18-002			
B. SUPPLIER'S NAME/ADDRESS:	Sun Energy Group LLC 2701 West 1100 South Huntingburg, Indiana 47542			
C. PRODUCTION FACILITY:	Hilsmeyer #1 Surface Mine Pike and Dubois Counties, Indiana			
D. METHOD OF DELIVERY:	Barge			
E. ACTUAL TONNAGE:	2018	-	83,828	Tons
	2019	-	61,786	Tons (through December)
F. ANNUAL TONNAGE REQUIREMENTS:	2018	-	80,000	Tons (Amendment One)
	2019	-	80,000	Tons <sup>4</sup>
	2020	-	240,000	Tons Contract
	2021	-	220,000	Tons terminated <sup>4</sup>
PERCENT OF ANNUAL REQUIREMENTS:	2018	-	104.79	%
	2019	-	77.23	% (through December)
G. CURRENT PRICE (Base):	<u>Quality A (11,200 BTU per lb.)</u>			
	2018	-	\$ 35.0000	per Ton
	2019	-	\$ 35.0000	per Ton (first 145,000 tons)
			\$ 35.9990	per Ton (next 20,000 tons)
	2020	-	\$ 35.9990	per Ton (first 20,000 tons)
			\$ 37.3498	per Ton (next 220,000 tons)
	2021	-	\$ 37.3498	per Ton
	<u>Quality B (10,600 BTU per lb.)</u>			
	2018	-	\$ 32.8791	per Ton
	2019	-	\$ 32.8791	per Ton (first 145,000 tons)
			\$ 33.8161	per Ton (next 20,000 tons)
	2020	-	\$ 33.8161	per Ton (first 20,000 tons)
			\$ 35.0839	per Ton (next 220,000 tons)
	2021	-	\$ 35.0839	per Ton
CURRENT PRICE (Contract):	<u>Quality A (11,200 BTU per lb.)</u>			
	2018	-	\$ 35.0000	per Ton
	2019	-	\$ 35.0000	per Ton
	<u>Quality B (10,600 BTU per lb.)</u>			
	2018	-	\$ 32.8791	per Ton
	2019	-	\$ 32.8791	per Ton

---

<sup>4</sup> Big Rivers provided a quality suspension notice on August 15, 2019. Big Rivers provided a contract termination notice on February 13, 2020.

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Alliance Coal, LLC**

A. CONTRACT NUMBER:	BRE-18-003		
B. SUPPLIER'S NAME/ADDRESS:	Alliance Coal, LLC 1717 South Boulder, Suite 400 Tulsa, OK 74119		
C. PRODUCTION FACILITY:	Riverview Coal, LLC – River View Mine Union County, Kentucky		
D. METHOD OF DELIVERY:	Barge		
E. ACTUAL TONNAGE:	2018 –	590,897	Tons
	2019 –	676,162	Tons
	2020 –	102,397	Tons <i>(through April)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2018 –	585,000	Tons <i>(effective date – February 12, 2018)</i>
	2019 –	300,000 min. 800,000 max.	Tons
	2020 –	300,000 min. 800,000 max.	Tons
PERCENT OF ANNUAL REQUIREMENTS:	2018 –	101.00 %	
	2019 –	100.17 %	<i>(through December)</i> <sup>5</sup>
	2020 –	24.09 %	<i>(through April)</i> <sup>6</sup>
G. CURRENT PRICE ( <i>Base</i> ):	2018 –	\$ 36.5010	per Ton
	2019 –	\$ 37.7499	per Ton
	2020 –	\$ 39.0011	per Ton
CURRENT PRICE ( <i>Contract</i> ):	2018 –	\$ 36.5010	per Ton
	2019 –	\$ 37.7499	per Ton

---

<sup>5</sup> Calculated based on 675,000 nominated tons for 2019.

<sup>6</sup> Calculated based on 425,000 nominated tons for 2020.

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCC”) and  
Ken American Resources, Inc**

A. CONTRACT NUMBER:	BRE-19-002			
B. SUPPLIER’S NAME / ADDRESS:	Western Kentucky Consolidated Resources, LLC KenAmerican Resources, Inc. 46226 National Road St. Clairsville, OH 43950			
C. PRODUCTION FACILITY:	WKCC Genesis Mine WKCC Pride Mine KenAmerican Paradise Mine			
D. METHOD OF DELIVERY:	Truck and/or barge			
E. ACTUAL TONNAGE:	2019	–	456,313	Tons
	2020	–	159,008	Tons <i>(through April)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2019	–	400,000 min. 500,000 max.	Tons
	2020	–	400,000 min. 500,000 max.	Tons
	2020 <i>Option</i>	–	0 min. 125,000 max.	Tons
	2021	–	400,000 min. 500,000 max.	Tons
	2021 <i>Option</i>	–	0 min. 125,000 max.	Tons
PERCENT OF ANNUAL REQUIREMENTS:	2019	–	101.40 %	<sup>7</sup>
	2020		37.41 %	<i>(through April)</i> <sup>8</sup>
G. CURRENT PRICE ( <i>Base</i> ):	2019	–	\$ 42.85	per Ton
	2020	–	\$ 42.85	per Ton
	2021	–	\$ 42.85	per Ton
CURRENT PRICE ( <i>Contract</i> ):	2019	–	\$ 42.85	per Ton
	2020	–	\$ 42.85	per Ton
	2021	–	\$ 42.85	per Ton

<sup>7</sup> Calculated based on 450,000 nominated tons for 2019. No Option tons nominated.

<sup>8</sup> Calculated based on 425,000 nominated tons for 2020. No Option tons nominated.



**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC and Pennyrile Energy LLC Coal Sales**

A. CONTRACT NUMBER:	BRE-19-003			
B. SUPPLIER'S NAME / ADDRESS:	Rhino Energy LLC/Pennyrile Energy, LLC. 424 Lewis Hargett Circle, Suite 250 Lexington, KY 40503			
C. PRODUCTION FACILITY:	Pennyrile Energy LLC Riveredge Mine McLean County, Kentucky			
D. METHOD OF DELIVERY:	Barge			
E. ACTUAL TONNAGE:	2019	-	69,186 Tons	<i>(through December)</i>
	2020	-	120,018 Tons	<i>(through April)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2019	-	100,000 min. Tons 150,000 max.	
	2020	-	100,000 min. Tons 150,000 max.	
	2021	-	350,000 min. Tons 500,000 max.	
	2022	-	200,000 min. Tons 350,000 max.	
	2023	-	200,000 min. Tons 350,000 max.	
PERCENT OF ANNUAL REQUIREMENTS:	2019	-	46.12 %	<i>(through December)</i> <sup>9</sup>
	2020	-	61.86 %	<i>(through April)</i> <sup>10</sup>

---

<sup>9</sup> Calculated based on 150,000 ton maximum for 2019 per assignment. Assigned to Alliance Coal on September 6, 2019. Referenced following assignment as Rhino/Alliance (BRE-19-003A).

<sup>10</sup> Calculated based on 112,500 nominated tons for 2020 *plus* 81,499 tons carryover from 2019 equaling 193,999 tons. 120,018 tons *divided by* 193,999 tons = 61.86%.

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC and Pennyrile Energy LLC Coal Sales (*continued*)**  
*(Contract Number – BRE-19-003)*

G. CURRENT PRICE ( <i>Base</i> ):	2019	–	\$ 40.67	per Ton ( <i>Jan. – Aug.</i> )
<i>Assigned Price</i>	2019	–	\$ 38.31	per Ton ( <i>Sept. – Dec.</i> )
<i>Assigned Price</i>	2020	–	\$ 39.37	per Ton
	2021	–	\$ 40.10	per Ton
	2022	–	\$ 41.37	per Ton
	2023	–	\$ 42.35	per Ton
 CURRENT PRICE ( <i>Contract</i> ):	2019	–	\$ 40.67	per Ton ( <i>Jan. – Aug.</i> )
<i>Assigned Price</i>	2019	–	\$ 38.31	per Ton ( <i>Sept. – Dec.</i> )
<i>Assigned Price</i>	2020	–	\$ 39.37	per Ton

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Alliance Coal, LLC and Warrior Coal, LLC**

A. CONTRACT NUMBER:	BRE-19-005
B. SUPPLIER'S NAME / ADDRESS:	Alliance Coal, LLC Warrior Coal, LLC 1717 South Boulder, Suite 400 Tulsa, OK 74119
C. PRODUCTION FACILITY:	Warrior Coal Company's Cardinal Mine Hopkins County, Kentucky
D. METHOD OF DELIVERY:	Truck
E. ACTUAL TONNAGE:	2019 - 241,538 Tons <i>(through December)</i>
F. ANNUAL TONNAGE REQUIREMENTS:	2019 - 225,000 min. Tons 300,000 max.
PERCENT OF ANNUAL REQUIREMENTS:	2019 - 99.09 % <i>(through December)</i> <sup>11</sup>
G. CURRENT PRICE ( <i>Base</i> ):	<u>Quality A (11,000 BTU per lb.)</u> 2019 - \$ 44.00 per Ton
	<u>Quality B (11,500 BTU per lb.)</u> 2019 - \$ 47.60 per Ton
CURRENT PRICE ( <i>Contract</i> ):	<u>Quality A (11,000 BTU per lb.)</u> 2019 - \$ 44.00 per Ton
	<u>Quality B (11,500 BTU per lb.)</u> 2019 - \$ 47.60 per Ton

---

<sup>11</sup> Calculated based on 243,750 nominated tons for 2019.

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCC”) and**  
**Muhlenberg County Cola Company, LLC (“MCCC”)**

A. CONTRACT NUMBER: BRE-20-001

B. SUPPLIER’S NAME / ADDRESS: Western Kentucky Consolidated Resources, LLC  
Muhlenberg County Coal Company, LLC  
46226 National Road  
St. Clairsville, OH 43950

C. PRODUCTION FACILITY: WKCC Genesis Mine  
WKCC Pride Mine

D. METHOD OF DELIVERY: Truck and/or barge

E. ACTUAL TONNAGE: 2020 – 125,583 Tons *(through April)*

F. ANNUAL TONNAGE REQUIREMENTS:

2020	–	300,000 min.	Tons
		400,000 max.	
2020	–	0 min.	Tons
<i>Option</i>		100,000 max.	
2021	–	300,000 min.	Tons
		400,000 max.	
2021	–	0 min.	Tons
<i>Option</i>		100,000 max.	
2022		300,000 min.	
		400,000 max.	
2022		0 min.	
<i>Option</i>		100,000 max.	
2023		300,000 min.	
		400,000 max.	
2023		0 min.	
<i>Option</i>		100,000 max.	

**Big Rivers Electric Corporation**  
**Case No. 2020-00250**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCC”) and**  
**Muhlenberg County Cola Company, LLC (“MCCC”) (*continued*)**  
*(Contract Number – BRE-20-001)*

PERCENT OF ANNUAL REQUIREMENTS:	2020 –	38.64 %	<i>(through April)</i> <sup>12</sup>
G. CURRENT PRICE ( <i>Base</i> ):	2020 –	\$ 42.75	per Ton ( <i>Jan. – May</i> )
	2020 –	\$ 42.65	per Ton ( <i>June – Dec.</i> )
	2021 –	\$ 43.25	per Ton
	2022 –	\$ 43.70	per Ton
	2023 –	\$ 44.15	per Ton
CURRENT PRICE ( <i>Contract</i> ):	2020 –	\$ 42.75	per Ton ( <i>Jan. – May</i> )
	2020 –	\$ 42.65	per Ton ( <i>June – Dec.</i> )
	2021 –	\$ 43.25	per Ton
	2022 –	\$ 43.70	per Ton
	2023 –	\$ 44.15	per Ton
OPTION PRICE ( <i>Contract</i> ):	2020 –	\$ 43.40	per Ton ( <i>Jan. – May</i> )
	2020 –	\$ 43.30	per Ton ( <i>June – Dec.</i> )
	2021 –	\$ 43.90	per Ton
	2022 –	\$ 44.35	per Ton
	2023 –	\$ 44.80	per Ton

---

<sup>12</sup> Calculated based on 325,000 nominated tons for 2020. No Option tons nominated.

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 3)**

2 *a. As of the last day of the review period, state the coal inventory level*  
3 *in tons and in number of days' supply. Provide this information by*  
4 *generating station and in the aggregate.*

5 *b. Describe the criteria used to determine number of days' supply.*

6 *c. State the target coal inventory level for each generating station, and*  
7 *for the total system.*

8 *d. If actual coal inventory exceeds the target inventory by ten days'*  
9 *supply, state the reasons for the excess inventory.*

10 *e.*

11 *(1) State whether any significant changes in the current coal*  
12 *inventory target are expected within the next 12 months.*

13 *(2) If so, state the expected change and the reasons for this change.*

14

15 **Response)**

16 *a. As of April 30, 2020, Big Rivers' generating stations individually and in the*  
17 *aggregate had the following inventory levels and days' supply.*

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission’s Request for Information  
dated August 19, 2020**

**September 2, 2020**

1

<b>Total System/Station</b>	<b>Inventory Level (Tons) <sup>1</sup></b>	<b>Number of Days’ Supply <sup>2</sup></b>	<b>Preceding Six-Month Operating Duration (In Days)</b>	<b>Preceding 6 Months Burn (In Tons)</b>
<b>Big Rivers Electric System</b>	833,749.10	95	74	653,320.61
<b>Reid Station <sup>3</sup></b>	0.00	0	0	0.00
<b>Station Two <sup>4</sup></b>	65,464.60	0	0	0.00
<b>Green Station</b>	312,725.91	91	51	174,478.07
<b>Coleman Station <sup>5</sup></b>	0.00	0	0	0.00
<b>Wilson Station</b>	455,558.59	116	112	478,842.54

2

3 b. Number of Days’ Supply =

$$\frac{\text{Current Inventory (Tons)}}{\text{Preceding 6 Months Burn (Tons)}} \times \text{Duration (In Days)}$$

4

5 c. Big Rivers Electric Corporation’s Target Supply is the following range for  
6 each Station in days based on the projected annual fuel burn

**Big Rivers Electric Corporation  
Coal Inventory Target Ranges**

Total System	30 – 60 Days
Reid Station	0 Days
Station Two	0 Days
Green	30 – 60 Days
Coleman	0 Days
Wilson	30 – 60 Days

7

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1       d.   Inventory is above target levels, exceeding ten (10) days excess, as a result  
2       of reduced electricity demand during a relatively mild winter and as a  
3       result of the early stages of the COVID-19 pandemic shuttering businesses.

4               Big Rivers' coal inventory level is beginning to fall based upon some  
5       resumption of business activity that had slowed due to COVID-19, along  
6       with the warmer temperatures and increased electricity demand of the  
7       summer months. Big Rivers, during the 2<sup>nd</sup> and 3<sup>rd</sup> Quarters of 2020,  
8       minimized all contract options in regard to existing coal supply, and  
9       further, has not procured any other spot coal during the review period, or  
10      throughout the summer, in an effort to reduce its current inventories. Big  
11      Rivers will also minimize its 4<sup>th</sup> Quarter 2020 coal options under current  
12      coal supply agreements. Current coal delivery and usage forecasts indicate  
13      that Big Rivers will move back into its inventory policy range of 30 to 60  
14      days toward the end of 2020 or early 2021, depending upon sustained coal  
15      usage.

16      e.

17           (1) No.



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 (2) Not Applicable.

2

**Footnotes to table in sub-part a. above -**

- 1.- Green Station and Wilson Stations each had a pet coke inventory of zero tons as of April 30, 2020.
- 2.- Number of days' supply is rounded to reflect whole days.
- 3.- Reid Station Unit 1 was placed in Inactive Reserve Status effective April 1, 2016. The duration of generation was reduced to zero days. Big Rivers plans to retire Reid Station Unit 1 in the coming months.<sup>2</sup>
- 4.- Station Two Units 1 and 2 were retired on February 1, 2019. The duration of generation was reduced to zero days.
- 5.- Coleman Station Units 1 and 2 were placed on Inactive Reserve Status on May 1, 2014, and Coleman Station Unit 3 was placed on Inactive Reserve Status on May 8, 2014. The duration of generation was reduced to zero days. Big Rivers plans to retire all the Coleman Station Units in the coming months.<sup>3</sup>

3

4

5 **Witness)** Mark W. McAdams

---

<sup>2</sup> See *In the Matter of: 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, Application at ¶ 9 and Direct Testimony of Michael T. Pullen, page 9 of 57.

<sup>3</sup> *Ibid.*

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 4)**     *List each written coal-supply solicitation issued during the*  
2 *period under review.*

3

4     *a. For each solicitation, provide the date of the solicitation, the type of*  
5     *solicitation (contract or spot), the quantities solicited, a general*  
6     *description of the quality of coal solicited, the time period over*  
7     *which deliveries were requested, and the generating unit(s) for*  
8     *which the coal was intended.*

9     *b. For each solicitation, state the number of vendors to whom the*  
10     *solicitation was sent, the number of vendors who responded, and the*  
11     *selected vendor. Provide the bid tabulation sheet or corresponding*  
12     *document that ranked the proposals. (This document should*  
13     *identify all vendors who made offers.) State the reasons for each*  
14     *selection. For each lowest-cost bid not selected, explain why the bid*  
15     *was not selected.*

16

17

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Response)**

2 a. and b.

3 There were no written coal-supply solicitations issued during the period  
4 from November 1, 2019, through April 30, 2020.

5

6

7 **Witness)** Mark W. McAdams

8

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 5)**     *List each oral coal-supply solicitation issued during the period*  
2 *under review.*

3

4     *a. For each solicitation, state why the solicitation was not written, the*  
5     *date(s) of the solicitation, the quantities solicited, a general*  
6     *description of the quality of coal solicited, the time period over*  
7     *which deliveries were requested, and the generating unit(s) for*  
8     *which the coal was intended.*

9     *b. For each solicitation, identify all vendors solicited and the vendor*  
10     *selected. Provide the tabulation sheet or other document that ranks*  
11     *the proposals. (This document should identify all vendors who*  
12     *made offers.) State the reasons for each selection. For each lowest-*  
13     *cost bid not selected, explain why the bid was not selected.*

14

15

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Response)**

2 a. and b.

3 There were no oral coal-supply solicitations issued during the period from  
4 November 1, 2019, through April 30, 2020.

5

6

7 **Witness)** Mark W. McAdams

8

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 6)** *For the period under review, list each vendor from whom natural*  
2 *gas was purchased for generation and the quantities and the nature of each*  
3 *purchase (i.e., spot or contract).*

4

5 **Response)** Please see the listing on the following page for vendors from whom  
6 natural gas was purchased for generation and the quantity and nature of each  
7 purchase from November 1, 2019, through April 30, 2020. Also on the following page  
8 please see the percentage of purchases that were either spot versus contract for the  
9 period under review in total.

10 Starting in July 2010, Big Rivers began purchasing natural gas under a North  
11 American Energy Standard Board ("NAESB") base contract for sale and purchase of  
12 natural gas. Actual purchases of gas are made using transaction confirmations that  
13 are governed by the NAESB contract. Big Rivers also entered into a contract with  
14 Texas Gas Transmission, LLC for the transportation and storage and borrowing of  
15 gas to Big Rivers' delivery point, the Reid Combustion Turbine. All of these contracts  
16 are on file with the Kentucky Public Service Commission.

17

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1

**For the Period from November 1, 2019, through April 30, 2020**

<b>Purchase Vendor</b>	<b>Fuel Type</b>	<b>MCF</b>	<b>Contract Type</b>
CIMA Energy, LTD	Natural Gas	230,199.00	Spot

**For the Period from November 1, 2019, through April 30, 2020**

Percentage Spot	100.00 %
Percentage Contract	0.00 %
Percentage Total	100.00 %

2

3

4 **Witness)** Mark W. McAdams

5

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 7)**     *For the period under review, state if there were any instances in*  
2 *which a natural gas generating unit could not be operated when it otherwise*  
3 *would have run due to pipeline constraints or natural gas being unavailable.*

4

5 **Response)** There were no instances during this review period that Big Rivers' gas  
6 generating unit could not be operated when it otherwise would have run, due to  
7 pipeline constraints or natural gas being unavailable.

8

9

10 **Witness)**   Mark W. McAdams

11



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 8)**     *State if there have been any changes to hedging activities for coal*  
2 *or natural gas purchases used for generation since the previous FAC review*  
3 *proceeding. If so, describe the changes in detail.*

4

5 **Response)** Big Rivers does not engage in financial hedging activities regarding its  
6 coal or natural gas purchases used for generation. Big Rivers does, however, stagger  
7 its purchases of coal to create a natural hedge on price volatility pursuant to Policy  
8 No. 111 – Hedge Policy. There have been no changes to these hedging activities since  
9 the previous FAC review.

10

11

12 **Witness)**     Mark W. McAdams

13

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 9)**

2 *a. State whether BREC has audited any of its fuel or transportation*  
3 *contracts during the period under review.*

4 *b. If so, for each audited contract:*

5 *(1) Identify the contract;*

6 *(2) Identify the auditor; and*

7 *(3) State the results of the audit, and describe the actions that Big*  
8 *Rivers took as a result of the audit.*

9

10 **Response)**

11 a. Big Rivers has not audited any of its fuel or transportation contracts during  
12 the period during the period under review, November 1, 2019, through April  
13 30, 2020.

14 b. (1) – (4)

15 Not Applicable.

16

17 **Witness)** Mark W. McAdams

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 10)**

2 **a. *State whether BREC is currently involved in any litigation with its***  
3 ***current or former fuel suppliers or transportation vendors.***

4 **b. *If yes, for each litigation:***

5 ***(1) Identify the supplier or vendor;***

6 ***(2) Identify the contract involved;***

7 ***(3) State the potential liability or recovery to Big Rivers;***

8 ***(4) List the issues presented; and***

9 ***(5) Provide a copy of the complaint or other legal pleading that***  
10 ***initiated the litigation and any answers or counterclaims. If***  
11 ***a copy has previously been filed with the Commission, provide***  
12 ***the date on which it was filed and the case in which it was***  
13 ***filed.***

14 **c. *State the current status of all litigation with suppliers or vendor.***

15

16

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Response)**

2 a. Big Rivers is not currently involved in any litigation with its current or  
3 former fuel suppliers or transportation vendors.

4 b. (1) – (5)

5 Not applicable.

6 c. Not applicable.

7

8

9 **Witness)** Mark W. McAdams

10

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 11)**

2 **a. *For the period under review, state if there have been any changes to***  
3 ***BREC's written policies and procedures regarding its fuel***  
4 ***procurement.***

5 **b. *If yes:***

6 ***(1) Describe the changes;***

7 ***(2) Provide the written policies and procedures as changed;***

8 ***(3) State the date(s) the changes were made; and***

9 ***(4) Explain why the changes were made.***

10 **c. *If no, provide the date BREC's current fuel procurement policies and***  
11 ***procedures were last changed, provide the date when they were last***  
12 ***provided to the Commission, and identify the proceeding in which***  
13 ***they were provided.***

14

15

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Response)**

2 a. Yes, during the period under review, *i.e.*, November 1, 2019, through April  
3 30, 2020, Big Rivers made changes to Policy No. 105 – Energy–Related  
4 Transaction Authority Policy – Appendix A. Also, during its document  
5 review to prepare this response, Big Rivers discovered that a prior change  
6 to Policy No. 120 – Fuel Procurement Policies and Procedures had not been  
7 reported. That change should have been reported in Case No. 2020-00009,  
8 the FAC review for May 1, 2019, through October 31, 2019.

9 b. (1) through (4)  
10 Policy No. 105 – Energy–Related Transaction Authority Policy – Appendix  
11 A

12 On March 17, 2020, Big Rivers changed this policy to modify the  
13 transaction authority for the Executive VP Operations, formerly VP  
14 Production. Also, throughout Appendix A, VP Production was changed to  
15 Executive VP Operations.

16  
17

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission’s Request for Information  
dated August 19, 2020**

**September 2, 2020**

1       Policy No. 120 – Fuel Procurement Policies and Procedures

2               On August 16, 2019, Big Rivers modified Policy No. 120, Section D.6.  
3       Contract Awards to reflect consistency with Commission regulations and  
4       legal requirements. Also, the last sentence of Section E.6. Amendments  
5       was modified to begin “Material amendments.”

6  
7       Copies of these two policies are attached to this response along with a  
8       redline showing the changes from the prior versions of these policies.

9       c. Big Rivers’ other fuel procurement policies and procedures were not  
10       changed during the period under review, *i.e.*, November 1, 2019, through  
11       April 30, 2020. In the table on the following page, Big Rivers lists these  
12       other written policies and procedures regarding fuel procurement, the date  
13       of their last changes, and the proceedings in which big Rivers provided  
14       them to the Commission.

15  
16

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1

<b>Big Rivers Electric Corporation Policies and Procedures for Fuel Procurement</b>				
<b>Number</b>	<b>Name</b>	<b>Date Last Change</b>	<b>Provided In</b>	<b>Date Provided</b>
111	Hedge Policy	2019-08-16	Case No. 2020-00009	2020-02-25
121	Solid Fuel Inventory Policy	2019-08-16	Case No. 2020-00009	2020-02-25
122	Energy-Related Transaction Credit Policy	2017-11-17	Case No. 2018-00221	2018-08-24

2

3

4 **Witness)** Mark W. McAdams

5



<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**1. Purpose**

The purpose of this appendix is to define the authority granted by the Big Rivers CEO (“CEO”) to Big Rivers’ staff and ACES to execute energy-related transactions.

**2. Objective**

The objective of this appendix is to extend authority within Policy 105 to Big Rivers’ internal staff and ACES.

**3. Procedural Requirements**

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

**Delegation of authority regarding Contract Requirements**

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the VP Energy Services the Director of Resources and Forecasting Senior Power Portfolio Optimization Analyst, and Manager Marketing and Member Relations.

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**4. Bilateral Energy and Capacity Purchases Transaction Authority**

The following outlines Big Rivers' staff and ACES bilateral transaction limits for energy and capacity transactions.

<b>Purchases</b>		<b>Per Transaction Limits (up to)</b>				<b>Aggregate Limits</b>	
<b>Title</b>	<b>Product</b>	<b>Term</b>	<b>Lead Time</b>	<b>MW Size</b>	<b>Min. \$/MWH</b>	<b>Total Volume MWH</b>	<b>Total \$</b>
VP Energy Services	Energy	≤ 1 Year	≤ 2 Years	≤ 200	No Limit	1,752,000	\$87,600,000
	Capacity	≤ 1 Year	≤ 1 Year	≤ 100	No Limit	878,400	\$2,400,000
Director Resources & Forecasting	Energy	≤ 3 Months	≤ 1 Year	≤ 100	No Limit	220,800	\$11,100,000
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Energy	≤ 1 Week	≤ 1 Month	≤ 200	No Limit	33,600	\$1,680,000
ACES	Energy	≤ 1 Day*	≤ 1 Week	≤ 200	No Limit	9,600	\$480,000

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**5. Bilateral Energy and Capacity Sales Transaction Authority**

The following outlines Big Rivers' staff and ACES bilateral transaction limits for energy and capacity transactions.

<b>Sales</b>		<b>Per Transaction Limits (up to)</b>				<b>Aggregate Limits</b>	
<b>Title</b>	<b>Product</b>	<b>Term</b>	<b>Lead Time</b>	<b>MW Size</b>	<b>Min. \$/MWH</b>	<b>Total Volume MWH</b>	<b>Total \$</b>
VP Energy Services	Energy	≤ 1 Year	≤ 2 Years	≤ 200	No Limit	3,508,800	No Limit
	Capacity	≤ 1 Year	≤ 1 Year	≤ 200	No Limit	1,756,800	No Limit
Director Resources & Forecasting	Energy	≤ 3 Months	≤ 1 Year	≤ 200	No Limit	1,756,800	No Limit
	Capacity	≤ 3 Months	≤ 1 Year	≤ 200	No Limit	1,756,800	No Limit
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Energy	≤ 1 Week	≤ 1 Month	≤ 200	No Limit	148,800	No Limit
ACES	Energy	≤ 1 Day*	≤ 1 Week	≤ 200	No Limit	33,600	No Limit

\* ≤ 1 Day will be a transaction that runs through hour ending 24 of the following business day, as such this would encompass all weekends and holidays for trading so long as the lead time and aggregate limits are followed.

**Delegation of authority regarding Firmness of Power**

The CEO delegates his authority to sell power that is more firm than the supply source to the VP Energy Services.

**Delegation of authority regarding Restricted Delivery Locations**

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the VP Energy Services.

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**6. MISO Transaction Authority**

The following outlines Big Rivers' staff and ACES transaction limits for MISO products.

		<b>MISO Per Transaction Limits (up to)</b>			
<b>Title</b>	<b>Product</b>	<b>Delivery Lead Time</b>	<b>Term</b>	<b>MW Size</b>	<b>\$/MWh</b>
VP Energy Services	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1750	
	Ancillary Service Awards			425	
	Capacity	≤ 2 Years	≤ 2Years	425	\$150/MW-day
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
Imports/Exports	No Max				
Director Resources & Forecasting	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1700	
	Ancillary Service Awards			425	
	Capacity	≤ 1 Year	≤ 1Year	425	\$150/MW-day
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	500				
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1675	
	Ancillary Service Awards			425	
	Financial Transmission Rights	< 6 Months	< 6 Months	425	\$10/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	450				
Energy Services Analyst	Demand Award	As Required by MISO	1 Operating Day	1675	MISO Price Cap
ACES	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1650	
	Ancillary Service Awards			425	
	Financial Transmission Rights	≤ 6 Months	≤ 6 Months	425	\$10/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	400				

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**7. PJM Transaction Authority (Non-Bilateral)**

The following outlines Big Rivers’ staff and ACES transaction limits for PJM products.

		<b>PJM Per Transaction Limits (up to)</b>			
<b>Title</b>	<b>Product</b>	<b>Delivery Lead Time</b>	<b>Term</b>	<b>MW Size</b>	<b>\$/MWh</b>
VP Energy Services	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	210	\$20
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	No Max	PJM Price Cap
Imports/Exports	No Max				
Director Resources & Forecasting	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 3 months	105	\$12
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	500				
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	450				
ACES	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	400				

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**8. SPP Transaction Authority**

(SPP transaction authority is granted here for the purpose of fulfilling the Nebraska Contracts approved by Big Rivers Board of Director's on December 20, 2013.)

The following outlines Big Rivers' staff and ACES transaction limits for SPP products.

Title	Product	SPP Per Transaction Limits (up to)			
		Delivery Lead Time	Term	MW Size	\$/MWh
VP Energy Services	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	No Max	SPP Price Cap
	Transmission Congestion Rights	≤ 1 Year	≤ 1 Year	80	\$20/MWh
Director Resources & Forecasting	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	≤ 6 months	≤ 6 months	80	\$12/MWh
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	< 6 Months	< 6 Months	80	\$10/MWh
Energy Services Analyst	Generation Awards	None			
	Demand Award	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	None			



<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

ACES	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	≤ 6 Months	≤ 6 Months	80	\$10/MWh

**SPP Authority Matrix Explanations**

- Generation Award Limits are per generating unit.
- Demand Award Limits are per each load location.
- Only Transmission Congestion Rights (TCRs) that are bought and sold via the annual and monthly auctions are monitored per the limits above. Participation in the Annual Allocation of TCRs is not considered a transaction subject to this Policy.
- Delivery lead time represents the time period between trade execution and start of flow.
- Transaction Limits represent the MW volume per hour and dollars/MWh for each transaction executed.
- Bilateral Settlement Schedules are not monitored. Bilateral power trades are monitored per the limits identified in the Bilateral Energy, Capacity and Transmission Purchases and Sales Transaction Authority Matrix.

Appendix A to Policy 105 - Energy Related Transaction Authority				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**9. Natural/Synthetic Gas and Transportation Transaction Authority**

The following outlines Big Rivers’ staff and ACES transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	\$/MMBtu	Total Physical Volume MMBtu	Total \$
Executive VP Operations	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	400,000	\$6 million
		≤ 1 Month		No Max	No Max		
Director Fuels Procurement	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	200,000	\$3 million
		≤ 1 Week	≤ 1 Month	No Max.	No Max.		
ACES	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000

**\*Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

**Delegation of authority regarding Gas Firmness**

The CEO delegates his authority to sell gas that is more firm than the supply source to the Executive VP Operations.

**Delegation of authority regarding Transportation Firmness and Volume**

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the Executive VP Operations.



<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**10. Renewable Energy Credits Trading Authority**

The following outlines transaction limits, definitions, and procedural requirements for renewable energy credit transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Total Volume MWh	\$/MWH	Total Volume MWh	Total \$
VP Energy Services	Renewable Energy Credits	≤ 2 Years	≤ 3 Years	200,000	\$10	400,000	\$4 Million
Director Resources & Forecasting	Renewable Energy Credits	<1 Year	<18 Months	100,000	\$5	200,000	\$1 Million
ACES	Renewable Energy Credits	As Directed	As Directed	As Directed	As Directed	As Directed	As Directed

**Renewable Energy Credits Trading Authority Matrix Explanations**

- The authority matrix above addresses authority for Renewable Energy Credits (REC's).
- Transaction Limits represent the total MWh volume and dollars/MWH for each REC transaction executed.
- Aggregate Limits represent the sum total MWh volume and dollars for all forward transactions.
- Term limits only apply to forward transactions, not spot transactions.
- Lead time represents the time period between trade execution and delivery of the REC's. Lead time limits only apply to forward transactions and not to spot transactions.

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**11. Fuel Oil Transaction Authority**

The following outlines Big Rivers' staff transaction limits for fuel oil transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$
Executive VP Operations	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million
		≤ 1 Month		No Max	No Max		
Director Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million
		≤ 1 Week	≤ 1 Month	No Max	No Max		

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**12. Solid Fuel Transaction Authority**

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
Executive VP Operations	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**13. Transportation Transaction Authority**

The following outlines Big Rivers' staff transaction limits for transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Executive VP Operations	Barge, Rail or Truck Transportation	> 3 Months ≤ 1 Years	≤ 1 Year	1 million	\$25	2 million	\$50 million
		≤ 3 Months		No Max	No Max		
Director Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 6 Months	≤ 1 Year	500,000	\$25	1 million	\$25 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**14. Emission Allowance Transaction Authority**

The following outlines Big Rivers' staff and ACES transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Energy Services	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
Director Resources & Forecasting	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million
ACES	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**15. Limestone Reagent Transaction Authority**

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Executive VP Operations	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million
Director Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**16. Bulk Lime and Lime Hydrate Reagent Transaction Authority**

The following outlines Big Rivers' staff transaction limits for bulk lime and lime hydrate reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Executive VP Operations	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	250,000	\$200	250,000	\$50 million
Director Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	62,500	\$200	62,500	\$12.5 million

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**17. MATS Reagent Transaction Authority**

The following outlines Big Rivers' staff transaction limits for MATS reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Executive VP Operations	MATS Reagent	≤ 1 Year	≤ 1 Year	8,500	\$4,000	8,500	\$ 34 million
Director Fuels Procurement	MATS Reagent	≤ 3 Months	≤ 1 Year	3,000	\$4,000	3,000	\$ 12 million



<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

**18. Acknowledgements**

**Violations and Sanctions**

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Director of Enterprise Risk Management and Strategic Planning who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, ACES employees are governed by the ACES Power Marketing Trading Sanctions Policy).

**Appendix Effective**

This Transaction Authority Appendix is in effect upon the CEO’s approval and shall remain in effect until a replacement appendix has been approved by the CEO.

**Responsibility**

It shall be the responsibility of the CEO, VP Energy Services, Executive VP Operations and the Big Rivers-IRMC and the ACES-IRMC to ensure compliance with this policy.

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

Revisions

<b>Big Rivers Policy 105/Appendix A Revision Record</b>			
Number	Date	Notes	Approved by
Rev. 0	11-04-2009	Energy Related Trans	Mark Bailey
Rev. 1	11-22-2010	MISO and other misc. updates	Mark Bailey
Rev. 2	01-04-2011	Updated Solid Fuel Transaction Authority	Mark Bailey
Rev. 3	03-18-2011	Added Limestone and Lime, general cleanup	Mark Bailey
Rev. 4	12-05-2011	Update Bi-Lateral and Emission limits, add authority for PJM FTRs, add VP of Production	Mark Bailey
Rev. 5	05-07-2012	Remove Senior VP Energy Services from document due to retirement/elimination of role	Mark Bailey
Rev. 6	07-12-2012	Change Director of Power Portfolio Optimization to Managing Director Energy Services	Mark Bailey
Rev. 7	02-01-2013	Updated MISO capacity and Natural Gas limits, changed VP Production to Chief Operating Officer, changed Managing Director Energy Services to VP Energy Services, added Manager Power Supply & Market Operations, changed Power Scheduling Analyst to Power Portfolio Optimization Analyst and added Energy Services Analyst	Mark Bailey
Rev. 8	12-18-2013	Updated aggregate limits for VP Energy Services, increased offer price caps for capacity, updated VP Energy Services gas authorization to ensure ability to execute standard Texas Gas contracts, changed Power Portfolio Optimization Analyst title to reflect Senior status, replaced Manager Power Supply & Market Operations with Director Power Supply & Market Operations	Mark Bailey
Rev. 9	07-21-2014	Allocate authority previously held by Chief Operating Officer to VP Energy Services and VP Production	Robert W. Berry

<b>Appendix A to Policy 105 - Energy Related Transaction Authority</b>				
Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<b>03/17/2020</b>	Approved by <b>CEO</b>
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<b>03/17/2020</b>	

Rev. 10	04-05-2016	Updated table under Section 4 to reflect new bilateral sales limits and deleted purchase authority, combined transaction authority for transportation, added to lime to be bulk lime and lime hydrate, and added MATS reagent limits.	Robert W. Berry
Rev. 11	04-15-2016	Added a footnote to the table in Section 4 to clearly define Big Rivers' interpretation for ACES pertaining to $\leq 1$ Day.	Robert W. Berry
Rev. 12	12-21-2016	Updated to reflect changes in Policy 105 adopted by the Board on December 16, 2016.	Robert W. Berry
Rev. 13	12-18-2017	Added SPP matrix to convey CEO's authority granted by Board resolution to Big Rivers' staff and ACES to conduct daily transactions for the Nebraska contracts.	Robert W. Berry
Rev. 14	10-31-2019	Added renewable energy credits trading authority added to Policy 105 adopted by the Board on August 16, 2019. Added bilateral energy and capacity purchases transaction authority & modified limits on sales. Removed Director Power Supply & Market Operations. Added Manager Marketing & Member Relations to authority matrix.	Robert W. Berry
Rev. 15	03-17-20	Changed authority for as transactions to Executive VP Operations. Also, changed title of VP Production to Executive VP Operations throughout appendix.	Robert W. Berry

Approved by CEO

CEO Signature:



Approval Date:

3-17-2020



# CEO POLICY

Policy Number: 105 Appendix A

Appendix A to Policy 105 - Energy Related Transaction Authority				
Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

- Deleted: 11
- Deleted: 5
- Deleted: 19
- Deleted: 11
- Deleted: 5
- Deleted: 19

## 1. Purpose

The purpose of this appendix is to define the authority granted by the Big Rivers CEO (“CEO”) to Big Rivers’ staff and ACES to execute energy-related transactions.

## 2. Objective

The objective of this appendix is to extend authority within Policy 105 to Big Rivers’ internal staff and ACES.

## 3. Procedural Requirements

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

### Delegation of authority regarding Contract Requirements

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the VP Energy Services the Director of Resources and Forecasting Senior Power Portfolio Optimization Analyst, and Manager Marketing and Member Relations.



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 4. Bilateral Energy and Capacity Purchases Transaction Authority

The following outlines Big Rivers' staff and ACES bilateral transaction limits for energy and capacity transactions.

Purchases		Per Transaction Limits (up to)				Aggregate Limits	
Title	Product	Term	Lead Time	MW Size	Min. \$/MWH	Total Volume MWH	Total \$
VP Energy Services	Energy	≤ 1 Year	≤ 2 Years	≤ 200	No Limit	1,752,000	\$87,600,000
	Capacity	≤ 1 Year	≤ 1 Year	≤ 100	No Limit	878,400	\$2,400,000
Director Resources & Forecasting	Energy	≤ 3 Months	≤ 1 Year	≤ 100	No Limit	220,800	\$11,100,000
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Energy	≤ 1 Week	≤ 1 Month	≤ 200	No Limit	33,600	\$1,680,000
ACES	Energy	≤ 1 Day*	≤ 1 Week	≤ 200	No Limit	9,600	\$480,000



# CEO POLICY

Policy Number: **105 Appendix A**

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	03/17/2020	Approved by	
Original Approval Date	11/4/2009	Date Last Revised	03/17/2020	CEO	

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 5. Bilateral Energy and Capacity Sales Transaction Authority

The following outlines Big Rivers' staff and ACES bilateral transaction limits for energy and capacity transactions.

Sales		Per Transaction Limits (up to)				Aggregate Limits	
Title	Product	Term	Lead Time	MW Size	Min. \$/MWH	Total Volume MWH	Total \$
VP Energy Services	Energy	≤ 1 Year	≤ 2 Years	≤ 200	No Limit	3,508,800	No Limit
	Capacity	≤ 1 Year	≤ 1 Year	≤ 200	No Limit	1,756,800	No Limit
Director Resources & Forecasting	Energy	≤ 3 Months	≤ 1 Year	≤ 200	No Limit	1,756,800	No Limit
	Capacity	≤ 3 Months	≤ 1 Year	≤ 200	No Limit	1,756,800	No Limit
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Energy	≤ 1 Week	≤ 1 Month	≤ 200	No Limit	148,800	No Limit
ACES	Energy	≤ 1 Day*	≤ 1 Week	≤ 200	No Limit	33,600	No Limit

\* ≤ 1 Day will be a transaction that runs through hour ending 24 of the following business day, as such this would encompass all weekends and holidays for trading so long as the lead time and aggregate limits are followed.

#### Delegation of authority regarding Firmness of Power

The CEO delegates his authority to sell power that is more firm than the supply source to the VP Energy Services.

#### Delegation of authority regarding Restricted Delivery Locations

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the VP Energy Services.



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 6. MISO Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for MISO products.

Title	Product	MISO Per Transaction Limits (up to)			
		Delivery Lead Time	Term	MW Size	\$/MWh
VP Energy Services	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1750	
	Ancillary Service Awards			425	
	Capacity	≤ 2 Years	≤ 2Years	425	\$150/MW-day
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
Imports/Exports	No Max				
Director Resources & Forecasting	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1700	
	Ancillary Service Awards			425	
	Capacity	≤ 1 Year	≤ 1Year	425	\$150/MW-day
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	500				
Senior Power Portfolio Optimization Analyst or Manager	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1675	
	Ancillary Service Awards			425	
	Financial Transmission Rights	< 6 Months	< 6 Months	425	\$10/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	450				
Energy Services Analyst	Demand Award	As Required by MISO	1 Operating Day	1675	MISO Price Cap
ACES	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1650	
	Ancillary Service Awards			425	
	Financial Transmission Rights	≤ 6 Months	≤ 6 Months	425	\$10/MWh
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
	Imports/Exports			400	



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	03/17/2020	Approved by
Original Approval Date	11/4/2009	Date Last Revised	03/17/2020	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 7. PJM Transaction Authority (Non-Bilateral)

The following outlines Big Rivers' staff and ACES transaction limits for PJM products.

Title	Product	PJM Per Transaction Limits (up to)			
		Delivery Lead Time	Term	MW Size	\$/MWh
VP Energy Services	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 1 Year	≤ 1 Year	210	\$20
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	No Max No Max	PJM Price Cap	
Director Resources & Forecasting	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 1 Year	< 3 months	105	\$12
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	400 500	PJM Price Cap	
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	400 450	PJM Price Cap	
ACES	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	400 400	PJM Price Cap	





# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 8. SPP Transaction Authority

(SPP transaction authority is granted here for the purpose of fulfilling the Nebraska Contracts approved by Big Rivers Board of Director's on December 20, 2013.)

The following outlines Big Rivers' staff and ACES transaction limits for SPP products.

		SPP Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
VP Energy Services	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	No Max	SPP Price Cap
	Transmission Congestion Rights	≤ 1 Year	≤ 1 Year	80	\$20/MWh
Director Resources & Forecasting	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	≤ 6 months	≤ 6 months	80	\$12/MWh
Senior Power Portfolio Optimization Analyst or Manager Marketing & Member Relations	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	< 6 Months	< 6 Months	80	\$10/MWh
Energy Services Analyst	Generation Awards	None			
	Demand Award	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	None			



# CEO POLICY

Policy Number: **105 Appendix A**

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<del>03/17/2020</del>	<b>CEO</b>

- Deleted: 11
- Deleted: 5
- Deleted: 19
- Deleted: 11
- Deleted: 5
- Deleted: 19

ACES	Generation Awards	As Required by SPP	1 Operating Day	30	SPP Price Cap
	Demand Awards			110	
	Virtual Transaction Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Ancillary Service Awards				
	Imports/Exports	As Required by SPP	1 Operating Day	110	SPP Price Cap
	Transmission Congestion Rights	≤ 6 Months	≤ 6 Months	80	\$10/MWh

### SPP Authority Matrix Explanations

- Generation Award Limits are per generating unit.
- Demand Award Limits are per each load location.
- Only Transmission Congestion Rights (TCRs) that are bought and sold via the annual and monthly auctions are monitored per the limits above. Participation in the Annual Allocation of TCRs is not considered a transaction subject to this Policy.
- Delivery lead time represents the time period between trade execution and start of flow.
- Transaction Limits represent the MW volume per hour and dollars/MWh for each transaction executed.
- Bilateral Settlement Schedules are not monitored. Bilateral power trades are monitored per the limits identified in the Bilateral Energy, Capacity and Transmission Purchases and Sales Transaction Authority Matrix.



# CEO POLICY

Policy Number: **105 Appendix A**

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<del>03/17/2020</del>	<b>CEO</b>

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 9. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	\$/MMBtu	Total Physical Volume MMBtu	Total \$
<del>Executive VP Operations</del>	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	400,000	\$6 million
		≤ 1 Month		No Max	No Max		
<del>Director Fuels Procurement</del>	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	200,000	\$3 million
		≤ 1 Week		≤ 1 Month	No Max.		
ACES	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000

Deleted: Energy Services

Deleted: Resources & Forecasting

**\*Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

#### Delegation of authority regarding Gas Firmness

The CEO delegates his authority to sell gas that is more firm than the supply source to the ~~Executive VP Operations~~.

Deleted: Energy Services

#### Delegation of authority regarding Transportation Firmness and Volume

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the ~~Executive VP Operations~~.

Deleted: Energy Services



# CEO POLICY

Policy Number: **105 Appendix A**

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<del>03/17/2020</del>	<b>CEO</b>

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 10. Renewable Energy Credits Trading Authority

The following outlines transaction limits, definitions, and procedural requirements for renewable energy credit transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Total Volume MWh	\$/MWH	Total Volume MWh	Total \$
VP Energy Services	Renewable Energy Credits	≤ 2 Years	≤ 3 Years	200,000	\$10	400,000	\$4 Million
Director Resources & Forecasting	Renewable Energy Credits	<1 Year	<18 Months	100,000	\$5	200,000	\$1 Million
ACES	Renewable Energy Credits	As Directed	As Directed	As Directed	As Directed	As Directed	As Directed

### Renewable Energy Credits Trading Authority Matrix Explanations

- The authority matrix above addresses authority for Renewable Energy Credits (REC's).
- Transaction Limits represent the total MWh volume and dollars/MWH for each REC transaction executed.
- Aggregate Limits represent the sum total MWh volume and dollars for all forward transactions.
- Term limits only apply to forward transactions, not spot transactions.
- Lead time represents the time period between trade execution and delivery of the REC's. Lead time limits only apply to forward transactions and not to spot transactions.



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 11. Fuel Oil Transaction Authority

The following outlines Big Rivers' staff transaction limits for fuel oil transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$
<del>Executive VP Operations</del>	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million
		≤ 1 Month		No Max	No Max		
Director Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million
		≤ 1 Week	≤ 1 Month	No Max	No Max		

Deleted: Production



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 12. Solid Fuel Transaction Authority

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
<del>Executive VP Operations</del>	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

Deleted: Production



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 13. Transportation Transaction Authority

The following outlines Big Rivers' staff transaction limits for transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
<del>Executive VP Operations</del>	Barge, Rail or Truck Transportation	> 3 Months ≤ 1 Years	≤ 1 Year	1 million	\$25	2 million	\$50 million
		≤ 3 Months		No Max	No Max		
Director Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 6 Months	≤ 1 Year	500,000	\$25	1 million	\$25 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

Deleted: Producti



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 14. Emission Allowance Transaction Authority

The following outlines Big Rivers' staff and ACES transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Energy Services	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
Director Resources & Forecasting	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million
ACES	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		





# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 15. Limestone Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
<del>Executive VP Operations</del>	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million
Director Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million

Deleted: Productio



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 16. Bulk Lime and Lime Hydrate Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for bulk lime and lime hydrate reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
<del>Executive VP Operations</del>	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	250,000	\$200	250,000	\$50 million
Director Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	62,500	\$200	62,500	\$12.5 million

Deleted: Production



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### 17. MATS Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for MATS reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
<del>Executive VP Operations</del>	MATS Reagent	≤ 1 Year	≤ 1 Year	8,500	\$4,000	8,500	\$ 34 million
Director Fuels Procurement	MATS Reagent	≤ 3 Months	≤ 1 Year	3,000	\$4,000	3,000	\$ 12 million

Deleted: Production



# CEO POLICY

Policy Number: 105 Appendix A

Appendix A to Policy 105 - Energy Related Transaction Authority				
Original Effective Date	11/4/2009	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	11/4/2009	Date Last Revised	<del>03/17/2020</del>	CEO

- Deleted: 11
- Deleted: 5
- Deleted: 19
- Deleted: 11
- Deleted: 5
- Deleted: 19

## 18. Acknowledgements

### Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Director of Enterprise Risk Management and Strategic Planning who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, ACES employees are governed by the ACES Power Marketing Trading Sanctions Policy).

### Appendix Effective

This Transaction Authority Appendix is in effect upon the CEO's approval and shall remain in effect until a replacement appendix has been approved by the CEO.

### Responsibility

It shall be the responsibility of the CEO, VP Energy Services, ~~Executive~~ VP ~~Operations~~ and the Big Rivers-IRMC and the ACES-IRMC to ensure compliance with this policy.

- Deleted: Production



# CEO POLICY

Policy Number: **105 Appendix A**

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<del>03/17/2020</del>	<b>CEO</b>

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

### Revisions

Big Rivers Policy 105/Appendix A Revision Record			
Number	Date	Notes	Approved by
Rev. 0	11-04-2009	Energy Related Trans	Mark Bailey
Rev. 1	11-22-2010	MISO and other misc. updates	Mark Bailey
Rev. 2	01-04-2011	Updated Solid Fuel Transaction Authority	Mark Bailey
Rev. 3	03-18-2011	Added Limestone and Lime, general cleanup	Mark Bailey
Rev. 4	12-05-2011	Update Bi-Lateral and Emission limits, add authority for PJM FTRs, add VP of Production	Mark Bailey
Rev. 5	05-07-2012	Remove Senior VP Energy Services from document due to retirement/elimination of role	Mark Bailey
Rev. 6	07-12-2012	Change Director of Power Portfolio Optimization to Managing Director Energy Services	Mark Bailey
Rev. 7	02-01-2013	Updated MISO capacity and Natural Gas limits, changed VP Production to Chief Operating Officer, changed Managing Director Energy Services to VP Energy Services, added Manager Power Supply & Market Operations, changed Power Scheduling Analyst to Power Portfolio Optimization Analyst and added Energy Services Analyst	Mark Bailey
Rev. 8	12-18-2013	Updated aggregate limits for VP Energy Services, increased offer price caps for capacity, updated VP Energy Services gas authorization to ensure ability to execute standard Texas Gas contracts, changed Power Portfolio Optimization Analyst title to reflect Senior status, replaced Manager Power Supply & Market Operations with Director Power Supply & Market Operations	Mark Bailey
Rev. 9	07-21-2014	Allocate authority previously held by Chief Operating Officer to VP Energy Services and VP Production	Robert W. Berry



# CEO POLICY

Policy Number: 105 Appendix A

## Appendix A to Policy 105 - Energy Related Transaction Authority

Original Effective Date	<b>11/4/2009</b>	Date Last Reviewed	<del>03/17/2020</del>	Approved by
Original Approval Date	<b>11/4/2009</b>	Date Last Revised	<del>03/17/2020</del>	<b>CEO</b>

Deleted: 11

Deleted: 5

Deleted: 19

Deleted: 11

Deleted: 5

Deleted: 19

Rev. 10	04-05-2016	Updated table under Section 4 to reflect new bilateral sales limits and deleted purchase authority, combined transaction authority for transportation, added to lime to be bulk lime and lime hydrate, and added MATS reagent limits.	Robert W. Berry
Rev. 11	04-15-2016	Added a footnote to the table in Section 4 to clearly define Big Rivers' interpretation for ACES pertaining to $\leq$ 1 Day.	Robert W. Berry
Rev. 12	12-21-2016	Updated to reflect changes in Policy 105 adopted by the Board on December 16, 2016.	Robert W. Berry
Rev. 13	12-18-2017	Added SPP matrix to convey CEO's authority granted by Board resolution to Big Rivers' staff and ACES to conduct daily transactions for the Nebraska contracts.	Robert W. Berry
Rev. 14	10-31-2019	Added renewable energy credits trading authority added to Policy 105 adopted by the Board on August 16, 2019. Added bilateral energy and capacity purchases transaction authority & modified limits on sales. Removed Director Power Supply & Market Operations. Added Manager Marketing & Member Relations to authority matrix.	Robert W. Berry
<u>Rev. 15</u>	<u>03-17-20</u>	<u>Changed authority for as transactions to Executive VP Operations. Also, changed title of VP Production to Executive VP Operations throughout appendix.</u>	<u>Robert W. Berry</u>

Approved by CEO

CEO Signature: \_\_\_\_\_

Approval Date: \_\_\_\_\_

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

Policy Purpose

The purpose of Big Rivers Electric Corporation (“Big Rivers”) Fuel Procurement Policies and Procedures is to present the principles that govern the procurement of fuel, reagent, and associated transportation. This policy is not intended to provide a step-by-step procedural flow, but place an emphasis on procurement policies and a concise overview of appropriate procurement practices. The awarding of Contracts and Purchase Orders will comply with business controls including corporate governance, authority limit matrices, auditing recommendations, and other established practices and limitations.

**FUEL PROCUREMENT POLICIES AND PROCEDURES**

**A. Definitions:**

1. "Agreement" means a legally binding document, in which one party agrees to sell and the other agrees to buy fuel, reagent, or transportation services for such, which is executed by both Buyer and Seller.
2. "Award Recommendation" means Big Rivers’ approval process for the review and approval by Senior Management of a recommended fuel, reagent, or transportation purchase that fall outside the limits established in Big Rivers’ granted authority limits outlined in the Energy Related Transaction Authority Policy (Board Policy 105).
3. "Contract" is an Agreement, Letter Agreement, Purchase Order, or Spot Contract for fuel supply, reagent, or such transportation with certain terms and conditions that describe the business transaction under which the Company procures fuel, reagent, and related transportation.
4. "Contract purchase" means any purchase of fuel, reagent, or transportation on behalf of the Company under a contract, typically more than one year’s duration.
5. "Department" means the Big Rivers’ Fuels Procurement Department.
6. "Director" means the Big Rivers’ Director Fuels Procurement.
7. “Emergency” means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments and other problems affecting the production or transportation of fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that could be reasonably foreseen as impairing the continued supply of fuel to Big Rivers facilities.
8. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Big Rivers’ generating units.
9. "Fuel" means combustibles purchased by Big Rivers for one or more of its generating stations.
10. ”VP Production” means Big Rivers’ principal individual responsible for power generation and fuel procurement, among other duties.

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

11. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
12. "Spot Contract" is a type of agreement that may be issued by Big Rivers for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
13. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of Big Rivers where the terms and conditions are incorporated in the Letter Agreement, Purchase Order or Spot Contract and the term is typically of one year or less.
14. "Station" means one of Big Rivers' generating facilities.
15. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
16. "Unit" means a generating unit at a station.
17. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

**B. Fuel Procurement Policies:**

This policy provides guidance to ensure an adequate supply of fuel and reagent of sufficient quality at the most competitive overall evaluated cost on a unit bus bar basis consistent with Big Rivers' obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. Big Rivers will use its best efforts to secure its fuel and reagent supply at competitive prices through solicitation for such.

Implementation of this policy is of highest priority to Big Rivers. The Department shall be organized and staffed, and fuel procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with this policy. Fuel, reagent, and related transportation shall be purchased at competitive prices considering all material factors. The factors include but are not limited to: quantity needed to maintain an adequate supply, quality necessary to ensure generating unit operating and maintenance characteristics and environmental standards, reliability of the supplier, creditworthiness, and forward planning to meet projected system requirements, and meeting emergency or other unusual circumstances that might affect operating conditions. From time to time, the Director will review this policy and recommend updates as appropriate.

**C. Organization:**

1. Department Structure. The Department shall be organized and staffed to effectively administer Big Rivers' fuel procurement function.



<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

2. Organizational Responsibility. The VP Production to whom the Director reports, has the responsibility for fuel procurement. The Director is responsible for the Department. Other departments may be called upon by the Department to the extent the Director or VP Production considers advisable in the execution of the functions of the Department.
  
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Director which is specified in the Energy Related Transaction Authority Policy (Board Policy 105). The Award Recommendation will be drafted by the Director. Contractual agreements and amendments for procurement shall be reviewed by legal counsel, and executed by the VP Production within the authority granted by Appendix A to the Energy Related Transaction Authority Policy (Board Policy 105). Greater expenditures shall require the signature of Big Rivers' President and Chief Executive Officer when such expenditure is within his trading authority as established by the Board of Directors ("Board"). These levels of authority may be amended, supplemented, or superseded as dictated by Big Rivers.
  
4. Reports. The Director will instruct the Department to prepare, maintain and distribute reports to management and others as deemed necessary for business operations and regulatory requirements.
  
5. Records. The Department shall maintain the following records:
  - a. Open Contract Files. The Department shall maintain the following on open status for at least one-year or longer as the contract term or other conditions warrant:
    1. For each current contract supplier, the files will contain:
      - a) Contract documents, amendments, purchase orders and escalation documentation;
      - b) General correspondence;
      - c) Invoices and invoice verification data;
      - d) Delivery records and quality analyses data;
      - e) Inspection reports and other data.
    2. A record of transportation equipment owned or leased by Big Rivers (as applicable).
    3. A list containing current suppliers and known potential Suppliers of fuel.
  - b. Closed Contract Files. The Department shall maintain its files according to Big Rivers' record retention plan.
  
6. General Administrative Duties. The Department shall subscribe to and have membership in appropriate trade and industry publications and/or associations, to include reports of governmental or consulting agencies concerning fuel, reagent, and related transportation market information, to include fuel prices and/or projections. Department personnel shall use their best efforts to keep current with fuel market conditions, prices and availability, and other developments relating to fuel procurement.

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

**D. Fuel Supply Procedures:**

1. Projections. In conjunction with other departments of Big Rivers, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in Big Rivers' planning process.
2. Contract/Spot Mix. Subject to the approval of the VP Production, the Director shall determine whether a contract purchase is advisable, considering the following factors: (a) the availability of adequate supplies from qualified suppliers, (b) the advisability or need to have an adequate supply committed for an existing or planned unit (subject to inventory limits specified by Big Rivers), (c) the desire to maintain practical flexibility as to market conditions and other factors affecting price and availability, (d) existing and anticipated environmental standards, (e) such other factors as may reasonably affect the implementation of this policy and (f) fuel impact on generation facilities' operation and maintenance.
3. Current Requirements. The Department shall review and analyze the data available to the Department for purposes of conducting fuel and reagent purchases in a timely manner to meet the requirements of Big Rivers.
4. Supplier Qualifications. Big Rivers shall select potential suppliers on the basis of evaluation, market intelligence, performance information (as available), industry research, and creditworthiness, as determined by the Director and his staff. No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

A supplier evaluation (to include site visit and mine engineering and/or performance report) may be performed to determine if a supplier has the ability to deliver in the time frame requested the quantity and quality of coal or reagent bid at the offered price.

5. Solicitations. The Department shall maintain a current list of Suppliers and shall review that list from time to time to ensure that it remains current. Normally, Big Rivers shall purchase its fuel and reagent through sealed bid solicitations; however, Big Rivers reserves the right to utilize its market intelligence to seize opportunity purchases of fuels and reagent, request oral, written, or electronic offers, potentially followed by negotiations, when in its judgment market conditions provide an opportunity to obtain fuel or reagent more advantageously than through mailed bid solicitations and usual procedures. When Big Rivers foregoes the solicitation process, documentation shall be appended to the resulting purchase order file describing the conditions. A notice of a request for quotation ("RFQ") shall be provided to normal industry newsletters and information postings. The normal solicitation process shall require that potential suppliers be notified in writing as to the general quantities, terms and quality specifications required. An RFQ number will be assigned to for the quotation package. An RFQ will include: instructions to bidders (date and time due); scope of supply (quantity and quality); potential term; standard terms and conditions of typical agreements.

Offers from potential suppliers shall be returned by the requested date and time or they will be rejected. A bid log shall be kept for logging in receipt of bid offers. Attendees viewing the

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

opening of the bid shall initial the bid document as opened and the log as at the completion of the opening. Offers shall be opened and logged in the presence of the VP Production and Director or their representative in their absence, and another selected representative outside of the Department.

All appropriate bid data shall be documented and electronically categorized for the process of evaluation of the various offerings of fuel and reagent. The documents shall be maintained in a secured area and shall be kept pursuant to normal record keeping practices.

6. Contract Awards. The Department shall review and analyze each Contract offer. The Director, or his/her representative, may engage in preliminary negotiations to determine which offers warrant further consideration. The Director and/or representative shall investigate the potential supplier and proposed source of supply; and, as to any offer for fuel, the Department shall verify the adequacy of the proposed source of supply as to quantity, quality, and timely deliverability.

The evaluation shall include, but not necessarily be limited to, the response to the RFQ (items required by the RFQ for satisfactory operational, environmental, and economic criteria); diversity of supply; supplier credit assessment; transportation mode and cost; and diversity of suppliers to provide the lowest evaluated cost of electrical energy to the Unit bus bar over the long term consistent with Kentucky Public Service Commission regulations.

From this initial evaluation, a select group of potential suppliers (a “short-list”) of suppliers shall be developed for more in-depth evaluation. The Department may then engage in preliminary discussions to ensure that the offer warrants further evaluation and consideration. The objective of the negotiating discussions is to ensure that Big Rivers achieves balanced terms and conditions and the lowest evaluated electrical energy delivered to the Unit bus bar and reliable supply consistent with other qualifiers related to supplier reliability, environmental restraints, transportation options, legal requirements, etc.

The recommended Supplier(s) shall be selected based upon the evaluation criteria and the results of the negotiating discussions. The Department shall prepare a detailed Award Recommendation for approval. The Award Recommendation shall document the selection criteria and pertinent factors, and in circumstances where more than one company is selected, the recommendation shall describe the tonnage requirements and other responsibilities of each of the other recommended Suppliers.

All contracts for which the term, tenor or notional amount exceed the limits specified for the Director must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy (Board Policy 105).

7. Spot Purchases. Spot purchases may be made by Big Rivers whenever considered advisable by the Director in furtherance of Big Rivers’ fuel and reagent needs, subject to the limit of authority as outlined by Energy Related Transaction Authority Policy (Board Policy 105).
8. Documentation. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of Big Rivers. A purchase order may be issued for a spot purchase. A purchase order

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

shall contain all terms of that purchase. Further, the Department shall maintain documentation of the final list (log) of bidders, a copy of the entire bid package; bidder's responses; and the bid evaluation summary used for decision support.

9. Fuel Oil. Fuel Supply Procedures principally address procurement of solid fuel. Fuel oil is procured on an "as-needed" basis due to the infrequency of use of this fuel and the nature of the oil markets. When the need for oil arises, the Department shall act to solicit vendors for offers. Orders are assigned on the basis of lowest delivered cost per gallon and ability to fill the order. Solicitation results shall be documented and purchase orders issued in the Department for those purchases initiated and completed by the Department.

**E. Fuel Supply and Reagent Agreement Administration:**

1. Compliance. The Department shall review and analyze daily business and operational reports to properly administer all fuel and transportation agreements.
2. Coal weights. Coal weights shall be obtained by either Big Rivers or by Supplier, upon agreement by Big Rivers. Coal weight is obtained by scale or draft method, depending upon Big Rivers' site or methodology employed by Supplier to ascertain weights. In either event, coal weights are obtained by industry-accepted standards, and in cases where scales are utilized, are duly tested and maintained in proper order for such purpose. In cases where draft weights are utilized, Big Rivers employs processes to verify actions to obtain draft weights and that such measures are by industry-accepted standards. Coal quantity is obtained by Station personnel and reported through the fuels information system or is provided by the Supplier pursuant to the contract agreement.
3. Coal sampling. Coal sampling and analysis shall be performed by either Big Rivers or the Supplier, upon agreement by Big Rivers. Coal sampling and analysis shall be performed according to procedures adopted by Big Rivers' laboratory in accordance with A.S.T.M. standards for coal sampling, coal sample preparation, coal sample identification, handling of sample, and coal analysis. Coal quality is assessed and reported through the fuels information system by Big Rivers' laboratory personnel or is provided by the Supplier pursuant to the contract agreement.
4. Amendments. A contract shall not be materially amended except after analysis by the Department and recommendation of the Director or the VP Production. No material contract or purchase order addendum shall be made except upon legal review of such amendment, recommendation of the Director and the approval of the VP Production pursuant to the limits of the Energy Related Transaction Authority Policy (Board Policy 105). Material amendments to contracts that were originally approved by the Board shall also be approved by the Board.
5. Contract Administration. The Director and the Department shall remain informed as to the terms and conditions of each current contract, and maintain the necessary data to administer the contracts. Every supplier request for a change in terms, conditions, or prices must be written and supported by adequate data in conformity with the contract. Each such request shall be analyzed by the Department against the contract provisions, and reported with recommendations to the

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

Director. After review by the Director, the supplier request and Department's recommendations shall be approved as required by Big Rivers. If any request is not approved in whole or in part, the Director shall advise the supplier, specifying Big Rivers' objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Big Rivers as dictated by contract terms shall be the primary method of resolving the issue.

6. Force Majeure. A supplier's claim for relief from compliance with fuel supply agreement terms due to force majeure conditions must be in writing with an adequate description of conditions warranting nonperformance. Each force majeure claim shall be reviewed by the Director and Big Rivers' legal counsel.
7. Inspections. The Director shall request inspections of mining and other facilities of a contract fuel and/or reagent supplier or other facilities as required or deemed necessary to manage the performance and contractual relationship (Contract Administration).

**F. Fuel and Reagent Supply Agreement Enforcement:**

1. General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by Big Rivers in a reasonable, fair, and practical manner to achieve supplier compliance with Big Rivers' overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
2. Director Responsibility. Whenever it is determined that a shipment does not meet Fuel Supply or Reagent Agreement terms, the Director, or his/her designee, shall inform the supplier and direct that subsequent shipments be in compliance. When necessary the VP Production and the Director may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
3. Legal Assistance. The Department shall have access to, and shall receive advice from, legal counsel as provided by Big Rivers on any matter relating to fuel, reagent, and related transportation procurement, contracts and amendments thereto, administration, and enforcement. Should a dispute as to a supplier's performance fail to be satisfactorily resolved by the Director, the matter shall be referred to legal counsel. Legal counsel may consider further negotiation, arbitration (if provided by the contract), or litigation. No arbitration or litigation shall commence except on the advice of said counsel with approval by Senior Management.

**G. Inventory Levels:**

Big Rivers has an obligation to ensure continuous low cost, reliable service to its Member-Owners. Decisions affecting fuel inventory shall consider these obligations.

Big Rivers shall maintain an adequate inventory while allowing for enough flexibility to permit inventory levels to be responsive to known and anticipated changes in conditions in an attempt to avoid risks and stoppages due to unforeseen conditions. Inventory shall be recommended based upon, but not limited to, supplier performance, environmental conditions, labor matters, logistical issues and concerns, and generation requirements and dispatch. The general level of inventory

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

shall be monitored for such matters and recommendations to adjust inventory to meet anticipated conditions shall be made from time to time. Such inventory recommendations shall be made by the Director for approval by Senior Management and shall be in accordance with or modify concurrently Solid Fuel Inventory Policy (Board Policy 121).

Solid fuel inventories and reagent shall be monitored and reported regularly via Big Rivers' fuel information system(s).

**H. Emergency Procurement:**

Any one or more of the procedures described herein may be waived by the VP Production, when, in the informed judgment of the Director, and on his recommendation, fuel must be purchased without complying with one or more of such provisions due to extraordinary conditions including strikes, lockouts or other labor problems affecting fuel production, embargoes, mining or other problems affecting production or transportation, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of fuel and reagent to Big Rivers from its existing suppliers. When such a purchase is made, documentation of circumstances will be appended to the purchase order and/or contract file.

**I. Transportation Services Contracts:**

Transportation services bids shall be requested and Contracts negotiated whenever appropriate. Consideration shall be given to plant requirements, supplier loading capabilities, relative location of supplier to Stations, transportation mix, unloading capabilities and capacities at Stations, logistic constraints, transportation provider economics, Station material handling economics, and any other factor which might affect the delivery of Fuel and reagent to the Stations.

Unless otherwise dictated by Emergency situations, the Solicitation process will be utilized for transportation services. The selection of transportation provider will generally be based upon, but not necessarily limited to cost, reliability, insurance, past / current performance, container availability and suitability for purpose, material handling capacities and constraints, transportation mix, and any other mitigating factors in terms of logistics.

All transportation service agreements shall be in written contractual form duly executed by an authorized supplier of service and Big Rivers.

**J. Ethics and Conduct:**

Big Rivers recognizes the importance of following appropriate business ethics to guide the conduct of the Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of Big Rivers including, but not limited to, the Board of Directors Ethics Policy (Board Policy 102) and the Conflicts of Interest Policy (Board Policy 108) for Big Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.



<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

Fuels staff shall endeavor to serve the best interests of Big Rivers, its Member-Owners, and stakeholders in the performance of their duties and responsibilities.

<b>Number</b>	<b>Date</b>	<b>Notes</b>	<b>Approved by</b>
<b>Original</b>	12/21/2007	Approved to be effective at close of unwind	Board
<b>Rev 1</b>	03/16/2012	Update out of date language and staffing changes	Board
<b>Rev 2</b>	03/14/2013	Update due to title change	
<b>Rev 3</b>	03/21/2014	Add date last reviewed line, section header and change “mmBTU” to “gallon”	Board
<b>Rev 4</b>	09/19/2014	Change Chief Operating Officer to VP Production	Board
<b>Rev 5</b>	08/21/2015	Add reference to Board Policy 105 – Energy Related Transaction Authority and Board Policy 121 – Solid Fuel Inventory; general clean up	Board
<b>Rev 6</b>	09/16/2016	Unified all references to Big Rivers Electric Corporation to Big Rivers, clarified policy references, minor wording change	Board
<b>Rev 7</b>	08/10/2018	Removed negotiating team from the process for preparing Award Recommendations	Board
<b>Rev 8</b>	08/16/2019	Added PSC regulations to contract awards and modified amendments to material amendments for requiring Board approval; general clean up	Board



# BOARD POLICY

Policy Number: 120

Fuel Procurement Policies and Procedures				
Original Effective Date	07/16/2009	Date Last Reviewed	08/10/2018	Approved by <b>BOARD</b>
Original Approval Date	12/20/2007	Date Last Revised	08/10/2018	

### Policy Purpose

The purpose of Big Rivers Electric Corporation (“Big Rivers”) Fuel Procurement Policies and Procedures is to present the principles that govern the procurement of fuel, reagent, and associated transportation. This policy is not intended to provide a step-by-step procedural flow, but place an emphasis on procurement policies and a concise overview of appropriate procurement practices. The awarding of Contracts and Purchase Orders will comply with business controls including corporate governance, authority limit matrices, auditing recommendations, and other established practices and limitations.

### **FUEL PROCUREMENT POLICIES AND PROCEDURES**

#### **A. Definitions:**

1. "Agreement" means a legally binding document, in which one party agrees to sell and the other agrees to buy fuel, reagent, or transportation services for such, which is executed by both Buyer and Seller.
2. "Award Recommendation" means Big Rivers’ approval process for the review and approval by Senior Management of a recommended fuel, reagent, or transportation purchase that fall outside the limits established in Big Rivers’ granted authority limits outlined in the Energy Related Transaction Authority Policy (Board Policy 105).
3. "Contract" is an Agreement, Letter Agreement, Purchase Order, or Spot Contract for fuel supply, reagent, or such transportation with certain terms and conditions that describe the business transaction under which the Company procures fuel, reagent, and related transportation.
4. "Contract purchase" means any purchase of fuel, reagent, or transportation on behalf of the Company under a contract, typically more than one year’s duration.
5. "Department" means the Big Rivers’ Fuels Procurement Department.
6. "Director" means the Big Rivers’ Director Fuels Procurement.
7. “Emergency” means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments and other problems affecting the production or transportation of fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that could be reasonably foreseen as impairing the continued supply of fuel to Big Rivers facilities.
8. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Big Rivers’ generating units.
9. "Fuel" means combustibles purchased by Big Rivers for one or more of its generating stations.
10. "VP Production” means Big Rivers’ principal individual responsible for power generation and fuel procurement, among other duties.





## BOARD POLICY

Policy Number: 120

Fuel Procurement Policies and Procedures				
Original Effective Date	07/16/2009	Date Last Reviewed	08/10/2018	Approved by <b>BOARD</b>
Original Approval Date	12/20/2007	Date Last Revised	08/10/2018	

11. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
12. "Spot Contract" is a type of agreement that may be issued by Big Rivers for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
13. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of Big Rivers where the terms and conditions are incorporated in the Letter Agreement, Purchase Order or Spot Contract and the term is typically of one year or less.
14. "Station" means one of Big Rivers' generating facilities.
15. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
16. "Unit" means a generating unit at a station.
17. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

**B. Fuel Procurement Policies:**

This policy provides guidance to ensure an adequate supply of fuel and reagent of sufficient quality at the most competitive overall evaluated cost on a unit bus bar basis consistent with Big Rivers' obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. Big Rivers will use its best efforts to secure its fuel and reagent supply at competitive prices through solicitation for such.

Implementation of this policy is of highest priority to Big Rivers. The Department shall be organized and staffed, and fuel procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with this policy. Fuel, reagent, and related transportation shall be purchased at competitive prices considering all material factors. The factors include but are not limited to: quantity needed to maintain an adequate supply, quality necessary to ensure generating unit operating and maintenance characteristics and environmental standards, reliability of the supplier, creditworthiness, and forward planning to meet projected system requirements, and meeting emergency or other unusual circumstances that might affect operating conditions. From time to time, the Director will review this policy and recommend updates as appropriate.

**C. Organization:**

1. Department Structure. The Department shall be organized and staffed to effectively administer Big Rivers' fuel procurement function.



# BOARD POLICY

Policy Number: 120

## Fuel Procurement Policies and Procedures

Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

2. Organizational Responsibility. The VP Production to whom the Director reports, has the responsibility for fuel procurement. The Director is responsible for the Department. Other departments may be called upon by the Department to the extent the Director or VP Production considers advisable in the execution of the functions of the Department.
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Director which is specified in the Energy Related Transaction Authority Policy (Board Policy 105). The Award Recommendation will be drafted by the Director. Contractual agreements and amendments for procurement shall be reviewed by legal counsel, and executed by the VP Production within the authority granted by Appendix A to the Energy Related Transaction Authority Policy (Board Policy 105). Greater expenditures shall require the signature of Big Rivers' President and Chief Executive Officer when such expenditure is within his trading authority as established by the Board of Directors ("Board"). These levels of authority may be amended, supplemented, or superseded as dictated by Big Rivers.
4. Reports. The Director will instruct the Department to prepare, maintain and distribute reports to management and others as deemed necessary for business operations and regulatory requirements.
5. Records. The Department shall maintain the following records:
  - a. Open Contract Files. The Department shall maintain the following on open status for at least one-year or longer as the contract term or other conditions warrant:
    1. For each current contract supplier, the files will contain:
      - a) Contract documents, amendments, purchase orders and escalation documentation;
      - b) General correspondence;
      - c) Invoices and invoice verification data;
      - d) Delivery records and quality analyses data;
      - e) Inspection reports and other data.
    2. A record of transportation equipment owned or leased by Big Rivers (as applicable).
    3. A list containing current suppliers and known potential Suppliers of fuel.
  - b. Closed Contract Files. The Department shall maintain its files according to Big Rivers' record retention plan.
6. General Administrative Duties. The Department shall subscribe to and have membership in appropriate trade and industry publications and/or associations, to include reports of governmental or consulting agencies concerning fuel, reagent, and related transportation market information, to include fuel prices and/or projections. Department personnel shall use their best efforts to keep current with fuel market conditions, prices and availability, and other developments relating to fuel procurement.

Deleted: Fuels



## BOARD POLICY

Policy Number: 120

Fuel Procurement Policies and Procedures				
Original Effective Date	07/16/2009	Date Last Reviewed	08/10/2018	Approved by
Original Approval Date	12/20/2007	Date Last Revised	08/10/2018	<b>BOARD</b>

**D. Fuel Supply Procedures:**

1. Projections. In conjunction with other departments of Big Rivers, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in Big Rivers’ planning process.
2. Contract/Spot Mix. Subject to the approval of the VP Production, the Director shall determine whether a contract purchase is advisable, considering the following factors: (a) the availability of adequate supplies from qualified suppliers, (b) the advisability or need to have an adequate supply committed for an existing or planned unit (subject to inventory limits specified by Big Rivers), (c) the desire to maintain practical flexibility as to market conditions and other factors affecting price and availability, (d) existing and anticipated environmental standards, (e) such other factors as may reasonably affect the implementation of this policy and (f) fuel impact on generation facilities’ operation and maintenance.
3. Current Requirements. The Department shall review and analyze the data available to the Department for purposes of conducting fuel and reagent purchases in a timely manner to meet the requirements of Big Rivers.
4. Supplier Qualifications. Big Rivers shall select potential suppliers on the basis of evaluation, market intelligence, performance information (as available), industry research, and creditworthiness, as determined by the Director and his staff. No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

A supplier evaluation (to include site visit and mine engineering and/or performance report) may be performed to determine if a supplier has the ability to deliver in the time frame requested the quantity and quality of coal or reagent bid at the offered price.

5. Solicitations. The Department shall maintain a current list of Suppliers and shall review that list from time to time to ensure that it remains current. Normally, Big Rivers shall purchase its fuel and reagent through sealed bid solicitations; however, Big Rivers reserves the right to utilize its market intelligence to seize opportunity purchases of fuels and reagent, request oral, written, or electronic offers, potentially followed by negotiations, when in its judgment market conditions provide an opportunity to obtain fuel or reagent more advantageously than through mailed bid solicitations and usual procedures. When Big Rivers foregoes the solicitation process, documentation shall be appended to the resulting purchase order file describing the conditions. A notice of a request for quotation (“RFQ”) shall be provided to normal industry newsletters and information postings. The normal solicitation process shall require that potential suppliers be notified in writing as to the general quantities, terms and quality specifications required. An RFQ number will be assigned to for the quotation package. An RFQ will include: instructions to bidders (date and time due); scope of supply (quantity and quality); potential term; standard terms and conditions of typical agreements.

Offers from potential suppliers shall be returned by the requested date and time or they will be rejected. A bid log shall be kept for logging in receipt of bid offers. Attendees viewing the



# BOARD POLICY

Policy Number: 120

## Fuel Procurement Policies and Procedures

Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

opening of the bid shall initial the bid document as opened and the log as at the completion of the opening. Offers shall be opened and logged in the presence of the VP Production and Director or their representative in their absence, and another selected representative outside of the Department.

All appropriate bid data shall be documented and electronically categorized for the process of evaluation of the various offerings of fuel and reagent. The documents shall be maintained in a secured area and shall be kept pursuant to normal record keeping practices.

6. Contract Awards. The Department shall review and analyze each Contract offer. The Director, or his/her representative, may engage in preliminary negotiations to determine which offers warrant further consideration. The Director and/or representative shall investigate the potential supplier and proposed source of supply; and, as to any offer for fuel, the Department shall verify the adequacy of the proposed source of supply as to quantity, quality, and timely deliverability.

The evaluation shall include, but not necessarily be limited to, the response to the RFQ (items required by the RFQ for satisfactory operational, environmental, and economic criteria); diversity of supply; supplier credit assessment; transportation mode and cost; and diversity of suppliers to provide the lowest evaluated cost of electrical energy to the Unit bus bar over the long term consistent with Kentucky Public Service Commission regulations.

From this initial evaluation, a select group of potential suppliers (a “short-list”) of suppliers shall be developed for more in-depth evaluation. The Department may then engage in preliminary discussions to ensure that the offer warrants further evaluation and consideration. The objective of the negotiating discussions is to ensure that Big Rivers achieves balanced terms and conditions and the lowest evaluated electrical energy delivered to the Unit bus bar and reliable supply consistent with other qualifiers related to supplier reliability, environmental restraints, transportation options, legal requirements, etc.

The recommended Supplier(s) shall be selected based upon the evaluation criteria and the results of the negotiating discussions. The Department shall prepare a detailed Award Recommendation for approval. The Award Recommendation shall document the selection criteria and pertinent factors, and in circumstances where more than one company is selected, the recommendation shall describe the tonnage requirements and other responsibilities of each of the other recommended Suppliers.

All contracts for which the term, tenor or notional amount exceed the limits specified for the Director must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy (Board Policy 105).

7. Spot Purchases. Spot purchases may be made by Big Rivers whenever considered advisable by the Director in furtherance of Big Rivers’ fuel and reagent needs, subject to the limit of authority as outlined by Energy Related Transaction Authority Policy (Board Policy 105).
8. Documentation. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of Big Rivers. A purchase order may be issued for a spot purchase. A purchase order



# BOARD POLICY

Policy Number: 120

## Fuel Procurement Policies and Procedures

Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

shall contain all terms of that purchase. Further, the Department shall maintain documentation of the final list (log) of bidders, a copy of the entire bid package; bidder's responses; and the bid evaluation summary used for decision support.

9. Fuel Oil. Fuel Supply Procedures principally address procurement of solid fuel. Fuel oil is procured on an "as-needed" basis due to the infrequency of use of this fuel and the nature of the oil markets. When the need for oil arises, the Department shall act to solicit vendors for offers. Orders are assigned on the basis of lowest delivered cost per gallon and ability to fill the order. Solicitation results shall be documented and purchase orders issued in the Department for those purchases initiated and completed by the Department.

**E. Fuel Supply and Reagent Agreement Administration:**

1. Compliance. The Department shall review and analyze daily business and operational reports to properly administer all fuel and transportation agreements.
2. Coal weights. Coal weights shall be obtained by either Big Rivers or by Supplier, upon agreement by Big Rivers. Coal weight is obtained by scale or draft method, depending upon Big Rivers' site or methodology employed by Supplier to ascertain weights. In either event, coal weights are obtained by industry-accepted standards, and in cases where scales are utilized, are duly tested and maintained in proper order for such purpose. In cases where draft weights are utilized, Big Rivers employs processes to verify actions to obtain draft weights and that such measures are by industry-accepted standards. Coal quantity is obtained by Station personnel and reported through the fuels information system or is provided by the Supplier pursuant to the contract agreement.
3. Coal sampling. Coal sampling and analysis shall be performed by either Big Rivers or the Supplier, upon agreement by Big Rivers. Coal sampling and analysis shall be performed according to procedures adopted by Big Rivers' laboratory in accordance with A.S.T.M. standards for coal sampling, coal sample preparation, coal sample identification, handling of sample, and coal analysis. Coal quality is assessed and reported through the fuels information system by Big Rivers' laboratory personnel or is provided by the Supplier pursuant to the contract agreement.
4. Amendments. A contract shall not be materially amended except after analysis by the Department and recommendation of the Director or the VP Production. No material contract or purchase order addendum shall be made except upon legal review of such amendment, recommendation of the Director and the approval of the VP Production pursuant to the limits of the Energy Related Transaction Authority Policy (Board Policy 105). Material amendments to contracts that were originally approved by the Board shall also be approved by the Board.
5. Contract Administration. The Director and the Department shall remain informed as to the terms and conditions of each current contract, and maintain the necessary data to administer the contracts. Every supplier request for a change in terms, conditions, or prices must be written and supported by adequate data in conformity with the contract. Each such request shall be analyzed by the Department against the contract provisions, and reported with recommendations to the

Deleted: A



## BOARD POLICY

Policy Number: 120

Fuel Procurement Policies and Procedures				
Original Effective Date	07/16/2009	Date Last Reviewed	08/10/2018	Approved by <b>BOARD</b>
Original Approval Date	12/20/2007	Date Last Revised	08/10/2018	

Director. After review by the Director, the supplier request and Department's recommendations shall be approved as required by Big Rivers. If any request is not approved in whole or in part, the Director shall advise the supplier, specifying Big Rivers' objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Big Rivers as dictated by contract terms shall be the primary method of resolving the issue.

6. Force Majeure. A supplier's claim for relief from compliance with fuel supply agreement terms due to force majeure conditions must be in writing with an adequate description of conditions warranting nonperformance. Each force majeure claim shall be reviewed by the Director and Big Rivers' legal counsel.
7. Inspections. The Director shall request inspections of mining and other facilities of a contract fuel and/or reagent supplier or other facilities as required or deemed necessary to manage the performance and contractual relationship (Contract Administration).

**F. Fuel and Reagent Supply Agreement Enforcement:**

1. General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by Big Rivers in a reasonable, fair, and practical manner to achieve supplier compliance with Big Rivers' overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
2. Director Responsibility. Whenever it is determined that a shipment does not meet Fuel Supply or Reagent Agreement terms, the Director, or his/her designee, shall inform the supplier and direct that subsequent shipments be in compliance. When necessary the VP Production and the Director may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
3. Legal Assistance. The Department shall have access to, and shall receive advice from, legal counsel as provided by Big Rivers on any matter relating to fuel, reagent, and related transportation procurement, contracts and amendments thereto, administration, and enforcement. Should a dispute as to a supplier's performance fail to be satisfactorily resolved by the Director, the matter shall be referred to legal counsel. Legal counsel may consider further negotiation, arbitration (if provided by the contract), or litigation. No arbitration or litigation shall commence except on the advice of said counsel with approval by Senior Management.

**G. Inventory Levels:**

Big Rivers has an obligation to ensure continuous low cost, reliable service to its Member-Owners. Decisions affecting fuel inventory shall consider these obligations.

Big Rivers shall maintain an adequate inventory while allowing for enough flexibility to permit inventory levels to be responsive to known and anticipated changes in conditions in an attempt to avoid risks and stoppages due to unforeseen conditions. Inventory shall be recommended based upon, but not limited to, supplier performance, environmental conditions, labor matters, logistical issues and concerns, and generation requirements and dispatch. The general level of inventory



# BOARD POLICY

Policy Number: 120

Fuel Procurement Policies and Procedures				
Original Effective Date	07/16/2009	Date Last Reviewed	08/10/2018	Approved by <b>BOARD</b>
Original Approval Date	12/20/2007	Date Last Revised	08/10/2018	

shall be monitored for such matters and recommendations to adjust inventory to meet anticipated conditions shall be made from time to time. Such inventory recommendations shall be made by the Director for approval by Senior Management and shall be in accordance with or modify concurrently Solid Fuel Inventory Policy (Board Policy 121).

Solid fuel inventories and reagent shall be monitored and reported regularly via Big Rivers' fuel information system(s).

**H. Emergency Procurement:**

Any one or more of the procedures described herein may be waived by the VP Production, when, in the informed judgment of the Director, and on his recommendation, fuel must be purchased without complying with one or more of such provisions due to extraordinary conditions including strikes, lockouts or other labor problems affecting fuel production, embargoes, mining or other problems affecting production or transportation, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of fuel and reagent to Big Rivers from its existing suppliers. When such a purchase is made, documentation of circumstances will be appended to the purchase order and/or contract file.

**I. Transportation Services Contracts:**

Transportation services bids shall be requested and Contracts negotiated whenever appropriate. Consideration shall be given to plant requirements, supplier loading capabilities, relative location of supplier to Stations, transportation mix, unloading capabilities and capacities at Stations, logistic constraints, transportation provider economics, Station material handling economics, and any other factor which might affect the delivery of Fuel and reagent to the Stations.

Unless otherwise dictated by Emergency situations, the Solicitation process will be utilized for transportation services. The selection of transportation provider will generally be based upon, but not necessarily limited to cost, reliability, insurance, past / current performance, container availability and suitability for purpose, material handling capacities and constraints, transportation mix, and any other mitigating factors in terms of logistics.

All transportation service agreements shall be in written contractual form duly executed by an authorized supplier of service and Big Rivers.

**J. Ethics and Conduct:**

Big Rivers recognizes the importance of following appropriate business ethics to guide the conduct of the Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of Big Rivers including, but not limited to, the Board of Directors Ethics Policy (Board Policy 102) and the Conflicts of Interest Policy (Board Policy 108) for Big Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.



## BOARD POLICY

Policy Number: 120

Fuel Procurement Policies and Procedures				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/10/2018</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/10/2018</b>	

Fuels staff shall endeavor to serve the best interests of Big Rivers, its Member-Owners, and stakeholders in the performance of their duties and responsibilities.

Number	Date	Notes	Approved by
<b>Original</b>	12/21/2007	Approved to be effective at close of unwind	Board
<b>Rev 1</b>	03/16/2012	Update out of date language and staffing changes	Board
<b>Rev 2</b>	03/14/2013	Update due to title change	
<b>Rev 3</b>	03/21/2014	Add date last reviewed line, section header and change “mmBTU” to “gallon”	Board
<b>Rev 4</b>	09/19/2014	Change Chief Operating Officer to VP Production	Board
<b>Rev 5</b>	08/21/2015	Add reference to Board Policy 105 – Energy Related Transaction Authority and Board Policy 121 – Solid Fuel Inventory; general clean up	Board
<b>Rev 6</b>	09/16/2016	Unified all references to Big Rivers Electric Corporation to Big Rivers, clarified policy references, minor wording change	Board
<b>Rev 7</b>	08/10/2018	Removed negotiating team from the process for preparing Award Recommendations	Board
<b><u>Rev 8</u></b>	<u>08/16/2019</u>	<u>Added PSC regulations to contract awards and modified amendments to material amendments for requiring Board approval; general clean up</u>	<u>Board</u>



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission’s Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 12)** *For the period under review, list all firm power commitments for*  
2 *a) purchases and (b) sales. This list shall identify the electric utility, the*  
3 *amount of commitment in megawatts, and the purpose of the commitment*  
4 *(i.e., peaking, emergency).*

5

6 **Response)**

7 (a) Purchases:

8 Big Rivers has a contract with Southeastern Power Administration  
9 (“SEPA”) to purchase up to 178 MWs of energy. A force majeure, previously  
10 declared by SEPA for this contract due to dam safety issues at Wolf Creek  
11 and Center Hill dams on the Cumberland System, remained in effect from  
12 November 1, 2019, into January 2020. For the period under review, Big  
13 Rivers has operated under an annual contract in which it was required to  
14 schedule purchases under the terms of weekly capacity declarations. On  
15 January 1, 2020, force majeure conditions due to dam safety issues on  
16 SEPA’s Cumberland River System ceased, raising Big Rivers’ SEPA

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 Cumberland hydropower allocation of dependable capacity from 154 MW to  
2 178 MW.

3 Additional purchases are shown on the table which follows. Please  
4 note, the purchases listed were made to support firm Off-System Sales and  
5 to adjust the amount of sales in selected months. The listed purchases were  
6 not passed through Big Rivers' FAC.

7

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission’s Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 (a) Purchases:

<b>Big Rivers Electric Corporation Power Purchases November 1, 2019 through April 30, 2020</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Nov 2019	ADM	50 MWs – On-Peak 16,600 Total	Off-System Sales Adjustments
Dec 2019	ADM	50 MWs – On-Peak 16,800 Total	Off-System Sales Adjustments
Nov – Dec 2019	MISO	100 MWs – Off-Peak 80,800 Total	Purchases for Off-System Sales
Nov – Dec 2019	MISO	50 MWs – On-Peak 32,800 Total	Purchases for Off-System Sales
Nov – Dec 2019	MISO	100 MWs – On-Peak 65,600 Total	Purchases for Off-System Sales
Nov – Dec 2019	MISO	50 MWs – Off-Peak 40,400 Total	Purchases for Off-System Sales
Jan – Feb 2020	MISO	50 MWs – Off-Peak 38,400 Total	Purchases for Off-System Sales

2

3

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission’s Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 (b) Sales:

2 Big Rivers has a contract to provide up to 100 MWs to the Kentucky  
3 Municipal Energy Agency (“KYMEA”). KYMEA uses this as a baseload  
4 resource.

5 Big Rivers has a second contract to provide up to 100 MWs to  
6 KYMEA. KYMEA uses this agreement for economic energy, when the  
7 contract price is below the cost of their other resources.

8 Big Rivers had a contract to provide up to 115 MWs to Owensboro  
9 Municipal Utilities (“OMU”). OMU used this agreement for economic  
10 energy when the contract price was below the cost of running OMU’s Elmer  
11 Smith Generating Station, or when the Elmer Smith Generating Station  
12 was unavailable. The 115 MW contract terminated on June 1, 2020, when  
13 OMU began taking energy from Big Rivers under a 6.5 year all-  
14 requirements contract.

15

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission’s Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 (b) Sales (continued) –

<b>Big Rivers Electric Corporation Firm Off-System Sales November 1, 2019 through April 30, 2020</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Nov – Dec 2019	NextEra	100 MWs – Off-Peak 80,800 Total	Off-System Sales
Nov – Dec 2019	EDF	50 MWs – On-Peak 32,800 total	Off-System Sales
Nov – Dec 2019	Morgan Stanley	100 MWs – On-Peak 65,600 Total	Off-System Sales
Nov – Dec 2019	Macquarie	50 MWs – Off-Peak 40,400 Total	Off-System Sales
Nov – Dec 2019	ADM	10 MWs – On-Peak 6,560 Total	Off-System Sales
Nov – Dec 2019	ADM	40 MWs – On-Peak 26,240 Total	Off-System Sales
Nov – Dec 2019	ADM	50 MWs – Off-Peak 40,400 Total	Off-System Sales
Nov 2019	ADM	50 MWs – On-Peak 800 Total	Off-System Sales
Nov 2019	ADM	50 MWs – On-Peak 4,000 Total	Off-System Sales
Nov 2019	ADM	50 MWs – On-Peak 2,400 Total	Off-System Sales

2

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 (b) Sales (continued) –

<b>Big Rivers Electric Corporation Firm Off-System Sales (continued) November 1, 2019 through April 30, 2020</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Jan – Feb 2020	Exelon	50 MWs – Off-Peak 38,400 Total	Off-System Sales
Jan – Feb 2020	ADM	50 MWs – On-Peak 33,600 Total	Off-System Sales
Jan – Feb 2020	ADM	50 MWs – On-Peak 33,600 Total	Off-System Sales
Jan – Feb 2020	ADM	50 MWs – On-Peak 33,600 Total	Off-System Sales

2

3

4 **Witness)** Natalie R. Hankins

5

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 13)** *Provide a monthly billing summary of sales to all electric*  
2 *utilities for the period under review.*

3

4 **Response)** Please see the attached monthly billing summaries for sales to all  
5 electric utilities for the period November 1, 2019, through April 30, 2020.

6

7

8 **Witness)** Jennifer M. Stone

9

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - November 2019**

Member Billing November 2019		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	JP RURALS	116,906	51,704,599	1,613,887.33	\$ 2,326,706.96	\$ 3,940,594.29
2	KENERGY	226,290	94,417,260	3,123,933.45	4,248,776.70	7,372,710.15
3	MEADE CO. RURALS	109,530	41,902,384	1,512,061.65	1,885,607.28	3,397,668.93
4						
5	<b>TOTAL RURALS</b>	<b>452,726</b>	<b>188,024,243</b>	<b>\$ 6,249,882.43</b>	<b>\$ 8,461,090.94</b>	<b>\$ 14,710,973.37</b>
6						
7		4,831	1,757,375	51,764.17	\$ 66,868.12	\$ 118,632.29
8		63	39,034	675.05	1,485.24	2,160.29
9		39,600	19,277,338	424,314.00	733,502.71	1,157,816.71
10		1,620	474,503	17,358.30	18,054.84	35,413.14
11		9,557	3,354,956	102,403.26	127,656.08	230,059.34
12		2,760	24,323	29,573.40	925.49	30,498.89
13		800	6,554	8,572.00	249.38	8,821.38
14		3,000	299,344	32,145.00	11,390.04	43,535.04
15		15,000	10,602,806	160,725.00	403,436.77	564,161.77
16		60	19,996	642.90	760.85	1,403.75
17		3,723	1,389,036	39,891.95	52,852.82	92,744.77
18		101	34,687	1,082.22	1,319.84	2,402.06
19		36,374	24,763,448	389,747.41	942,249.20	1,331,996.61
20		4,200	112,539	45,003.00	4,282.11	49,285.11
21		3,470	1,561,070	37,181.05	59,398.71	96,579.76
22		100	0	1,071.50	-	1,071.50
23		250	31,441	2,678.75	1,196.33	3,875.08
24		7,114	4,170,282	76,226.51	158,679.23	234,905.74
25		12,131	6,248,652	129,983.67	237,761.21	367,744.88
26		1,393	690,422	14,926.00	26,270.56	41,196.56
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>146,147</b>	<b>74,857,806</b>	<b>\$ 1,565,965.14</b>	<b>\$ 2,848,339.53</b>	<b>\$ 4,414,304.67</b>
29						
30		100	11,157	1,071.50	424.52	1,496.02
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>146,247</b>	<b>74,868,963</b>	<b>\$ 1,567,036.64</b>	<b>\$ 2,848,764.05</b>	<b>\$ 4,415,800.69</b>
33						
34	<b>GRAND TOTAL</b>	<b>598,973</b>	<b>262,893,206</b>	<b>\$ 7,816,919.07</b>	<b>\$ 11,309,854.99</b>	<b>\$ 19,126,774.06</b>



**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - November 2019**

Member Billing November 2019		Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	JP RURALS	\$ 6.00	\$ -	\$ -	\$ 138,516.62	\$ 230,120.02
2	KENERGY	-	-	-	252,943.84	429,901.35
3	MEADE CO. RURALS	-	-	-	112,256.49	197,670.13
4						
5	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 503,716.95</b>	<b>\$ 857,691.50</b>
6						
7		\$ -	\$ -	\$ -	\$ 4,708.01	\$ 6,983.62
8		-	471.46		104.57	129.13
9		-	-	(106,589.61)	51,643.99	62,913.23
10		-	-	-	1,271.19	2,070.77
11		-	2,325.16	11,926.71	8,987.93	13,528.33
12		-	-	65.50	65.16	1,676.58
13		-	-	(63.17)	17.56	484.79
14		-	-	-	801.94	2,466.75
15		-	-	-	28,404.92	33,835.13
16		-	-	-	53.57	82.41
17		-	-	-	3,721.23	5,463.89
18		-	75.01	-	92.93	141.16
19		-	-	-	66,341.28	79,810.34
20		-	-	-	301.49	2,729.65
21		-	-	-	4,182.11	5,721.68
22		-	-	-	-	58.66
23		-	-	-	84.23	220.90
24		-	-	-	11,172.19	14,020.31
25		-	-	-	16,740.14	21,870.98
26		-	-	-	1,849.64	2,447.43
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 2,871.63</b>	<b>\$ (94,660.57)</b>	<b>\$ 200,544.08</b>	<b>\$ 256,655.74</b>
29						
30		-	-	-	29.89	85.01
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 2,871.63</b>	<b>\$ (94,660.57)</b>	<b>\$ 200,573.97</b>	<b>\$ 256,740.75</b>
33						
34	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 2,871.63</b>	<b>\$ (94,660.57)</b>	<b>\$ 704,290.92</b>	<b>\$ 1,114,432.25</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - November 2019**

Member Billing November 2019	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1 JP RURALS	\$ 123,987.63	\$ 4,433,224.56	\$ (297,343.80)	\$ 4,135,880.76
2 KENERGY	226,412.59	8,281,967.93	(542,976.56)	7,738,991.37
3 MEADE CO. RURALS	100,481.92	3,808,077.47	(240,973.04)	3,567,104.43
4				
5 <b>TOTAL RURALS</b>	<b>\$ 450,882.14</b>	<b>\$ 16,523,269.96</b>	<b>\$ (1,081,293.40)</b>	<b>\$ 15,441,976.56</b>
6				
7	\$ 4,214.19	\$ 134,538.11	\$ (8,051.65)	\$ 126,486.46
8	93.60	2,959.05	(178.83)	2,780.22
9	46,227.06	1,212,011.38	(78,686.34)	1,133,325.04
10	1,137.86	39,892.96	(2,174.01)	37,718.95
11	8,045.18	274,872.65	(15,371.15)	259,501.50
12	58.33	32,364.46	(111.43)	32,253.03
13	15.72	9,276.28	(30.01)	9,246.27
14	717.83	47,521.56	(1,371.47)	46,150.09
15	25,425.53	651,827.35	(48,578.15)	603,249.20
16	47.95	1,587.68	(91.63)	1,496.05
17	3,330.91	105,260.80	(6,364.04)	98,896.76
18	83.18	2,794.34	(158.94)	2,635.40
19	59,382.75	1,537,530.98	(113,456.97)	1,424,074.01
20	269.87	52,586.12	(515.59)	52,070.53
21	3,743.45	110,227.00	(7,152.26)	103,074.74
22	-	1,130.16	-	1,130.16
23	75.40	4,255.61	(144.03)	4,111.58
24	10,000.34	270,098.58	(19,106.67)	250,991.91
25	14,984.27	421,340.27	(28,629.03)	392,711.24
26	1,655.63	47,149.26	(3,163.27)	43,985.99
27				
28 <b>Sub-Total Kenergy Industrials</b>	<b>\$ 179,509.05</b>	<b>\$ 4,959,224.60</b>	<b>\$ (333,335.47)</b>	<b>\$ 4,625,889.13</b>
29				
30	26.75	1,637.67	(51.13)	1,586.54
31				
32 <b>TOTAL INDUSTRIALS</b>	<b>\$ 179,535.80</b>	<b>\$ 4,960,862.27</b>	<b>\$ (333,386.60)</b>	<b>\$ 4,627,475.67</b>
33				
34 <b>GRAND TOTAL</b>	<b>\$ 630,417.94</b>	<b>\$ 21,484,132.23</b>	<b>\$ (1,414,680.00)</b>	<b>\$ 20,069,452.23</b>

Case No. 2020-00250

Attachment for Response to PSC 1-13

Witness: Jennifer M. Stone

Page 3 of 30

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - December 2019**

Member Billing December 2019		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	JP RURALS	111,198	54,734,906	1,535,088.39	\$ 2,463,070.77	\$ 3,998,159.16
2	KENERGY	203,928	98,698,156	2,815,226.04	4,441,417.02	7,256,643.06
3	MEADE CO. RURALS	105,638	44,466,052	1,458,332.59	2,000,972.34	3,459,304.93
4						
5	<b>TOTAL RURALS</b>	<b>420,764</b>	<b>197,899,114</b>	<b>\$ 5,808,647.02</b>	<b>\$ 8,905,460.13</b>	<b>\$ 14,714,107.15</b>
6						
7		4,755	1,555,000	50,949.83	\$ 59,167.75	\$ 110,117.58
8		68	40,512	728.62	1,541.48	2,270.10
9		39,600	20,400,354	424,314.00	776,233.47	1,200,547.47
10		1,620	487,094	17,358.30	18,533.93	35,892.23
11		9,450	3,501,506	101,256.75	133,232.30	234,489.05
12		2,760	22,347	29,573.40	850.30	30,423.70
13		800	27,576	8,572.00	1,049.27	9,621.27
14		3,000	323,953	32,145.00	12,326.41	44,471.41
15		15,000	11,008,552	160,725.00	418,875.40	579,600.40
16		60	20,109	642.90	765.15	1,408.05
17		3,667	1,195,645	39,291.91	45,494.29	84,786.20
18		107	31,549	1,146.51	1,200.44	2,346.95
19		35,640	23,782,284	381,882.60	904,915.91	1,286,798.51
20		840	165,328	9,000.60	6,290.73	15,291.33
21		3,440	1,466,844	36,859.60	55,813.41	92,673.01
22		100	0	1,071.50	-	1,071.50
23		250	30,685	2,678.75	1,167.56	3,846.31
24		7,137	4,035,468	76,472.96	153,549.56	230,022.52
25		12,111	6,699,843	129,769.37	254,929.03	384,698.40
26		1,443	715,891	15,461.75	27,239.65	42,701.40
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>141,848</b>	<b>75,510,540</b>	<b>\$ 1,519,901.35</b>	<b>\$ 2,873,176.04</b>	<b>\$ 4,393,077.39</b>
29						
30		1,739	102,937	18,633.39	3,916.75	22,550.14
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>143,587</b>	<b>75,613,477</b>	<b>\$ 1,538,534.74</b>	<b>\$ 2,877,092.79</b>	<b>\$ 4,415,627.53</b>
33						
34	<b>GRAND TOTAL</b>	<b>564,351</b>	<b>273,512,591</b>	<b>\$ 7,347,181.76</b>	<b>\$ 11,782,552.92</b>	<b>\$ 19,129,734.68</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - December 2019**

Member Billing December 2019		Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	JP RURALS	\$ 6.00	\$ -	\$ -	\$ 101,040.64	\$ 296,790.09
2	KENERGY	-	-	-	182,196.80	538,480.65
3	MEADE CO. RURALS	-	-	-	82,084.33	255,928.99
4						
5	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 365,321.77</b>	<b>\$ 1,091,199.73</b>
6						
7		\$ -	\$ -	\$ -	\$ 2,870.53	\$ 8,188.35
8		-	407.17	-	74.79	171.32
9		-	-	(106,589.61)	37,659.05	82,821.29
10		-	-	-	899.18	2,663.07
11		-	-	14,078.62	6,463.78	17,493.26
12		-	-	72.18	41.25	2,141.05
13		-	-	4.15	50.91	683.20
14		-	-	-	598.02	3,216.37
15		-	-	-	20,321.79	43,939.91
16		-	32.15	-	37.12	104.77
17		-	-	7,950.53	2,207.16	6,304.22
18		-	64.29	-	58.24	174.04
19		-	-	-	43,902.10	97,357.08
20		-	-	(9,000.60)	305.20	1,122.00
21		-	-	-	2,707.79	6,938.27
22		-	-	-	-	75.17
23		-	-	-	56.64	278.98
24		-	-	-	7,449.47	17,338.89
25		-	-	-	12,367.91	28,983.56
26		-	-	-	1,321.53	3,208.89
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 503.61</b>	<b>\$ (93,484.73)</b>	<b>\$ 139,392.46</b>	<b>\$ 323,203.69</b>
29						
30		-	-	-	190.02	1,612.67
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 503.61</b>	<b>\$ (93,484.73)</b>	<b>\$ 139,582.48</b>	<b>\$ 324,816.36</b>
33						
34	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 503.61</b>	<b>\$ (93,484.73)</b>	<b>\$ 504,904.25</b>	<b>\$ 1,416,016.09</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - December 2019**

Member Billing December 2019	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1 JP RURALS	\$ 131,254.30	\$ 4,527,250.19	\$ (293,825.58)	\$ 4,233,424.61
2 KENERGY	236,678.18	8,213,998.69	(529,827.20)	7,684,171.49
3 MEADE CO. RURALS	106,629.59	3,903,947.84	(238,700.76)	3,665,247.08
4				
5 <b>TOTAL RURALS</b>	<b>\$ 474,562.07</b>	<b>\$ 16,645,196.72</b>	<b>\$ (1,062,353.54)</b>	<b>\$ 15,582,843.18</b>
6				
7	\$ 3,728.89	\$ 124,905.35	\$ (6,972.14)	\$ 117,933.21
8	97.15	3,020.53	(181.65)	2,838.88
9	48,920.05	1,263,358.25	(80,868.16)	1,182,490.09
10	1,168.05	40,622.53	(2,183.98)	38,438.55
11	8,396.61	280,921.32	(15,699.61)	265,221.71
12	53.59	32,731.77	(100.18)	32,631.59
13	66.13	10,425.66	(123.62)	10,302.04
14	776.84	49,062.64	(1,452.49)	47,610.15
15	26,398.51	670,260.61	(49,358.82)	620,901.79
16	48.22	1,630.31	(90.16)	1,540.15
17	2,867.16	104,115.27	(5,360.87)	98,754.40
18	75.65	2,719.17	(141.48)	2,577.69
19	57,029.92	1,485,087.61	(106,632.15)	1,378,455.46
20	396.46	8,114.39	(741.26)	7,373.13
21	3,517.49	105,836.56	(6,576.87)	99,259.69
22	-	1,146.67	-	1,146.67
23	73.58	4,255.51	(137.57)	4,117.94
24	9,677.05	264,487.93	(18,093.73)	246,394.20
25	16,066.22	442,116.09	(30,039.97)	412,076.12
26	1,716.71	48,948.53	(3,209.84)	45,738.69
27				
28 <b>Sub-Total Kenergy Industrials</b>	<b>\$ 181,074.28</b>	<b>\$ 4,943,766.70</b>	<b>\$ (327,964.55)</b>	<b>\$ 4,615,802.15</b>
29				
30	246.84	24,599.67	(461.54)	24,138.13
31				
32 <b>TOTAL INDUSTRIALS</b>	<b>\$ 181,321.12</b>	<b>\$ 4,968,366.37</b>	<b>\$ (328,426.09)</b>	<b>\$ 4,639,940.28</b>
33				
34 <b>GRAND TOTAL</b>	<b>\$ 655,883.19</b>	<b>\$ 21,613,563.09</b>	<b>\$ (1,390,779.63)</b>	<b>\$ 20,222,783.46</b>

Case No. 2020-00250

Attachment for Response to PSC 1-13

Witness: Jennifer M. Stone

Page 6 of 30

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - January 2020**

Member Billing January 2020		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	JP RURALS	112,037	56,746,047	1,546,670.79	\$ 2,553,572.12	\$ 4,100,242.91
2	KENERGY	205,846	102,444,152	2,841,704.03	4,609,986.84	7,451,690.87
3	MEADE CO. RURALS	95,453	45,637,898	1,317,728.67	2,053,705.41	3,371,434.08
4						
5	<b>TOTAL RURALS</b>	<b>413,336</b>	<b>204,828,097</b>	<b>\$ 5,706,103.49</b>	<b>\$ 9,217,264.37</b>	<b>\$ 14,923,367.86</b>
6						
7		4,831	1,966,500	51,764.17	\$ 74,825.33	\$ 126,589.50
8		68	41,117	728.62	1,564.50	2,293.12
9		39,600	20,743,171	424,314.00	789,277.66	1,213,591.66
10		1,912	649,728	20,487.08	24,722.15	45,209.23
11		15,000	11,112,560	160,725.00	422,832.91	583,557.91
12		68	22,641	728.62	861.49	1,590.11
13		3,767	1,626,196	40,363.41	61,876.76	102,240.17
14		100	40,092	1,071.50	1,525.50	2,597.00
15		36,590	25,465,625	392,061.85	968,967.03	1,361,028.88
16		3,360	160,258	36,002.40	6,097.82	42,100.22
17		3,485	1,396,156	37,341.78	53,123.74	90,465.52
18		100	0	1,071.50	-	1,071.50
19		250	30,964	2,678.75	1,178.18	3,856.93
20		6,933	4,529,438	74,287.10	172,345.12	246,632.22
21		12,215	7,224,939	130,883.73	274,908.93	405,792.66
22		1,437	771,469	15,397.46	29,354.40	44,751.86
23		3,000	328,516	32,145.00	12,500.03	44,645.03
24		2,760	21,868	29,573.40	832.08	30,405.48
25		800	20,188	8,572.00	768.15	9,340.15
26		9,425	3,635,063	100,988.88	138,314.15	239,303.03
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>145,701</b>	<b>79,786,489</b>	<b>\$ 1,561,186.25</b>	<b>\$ 3,035,875.93</b>	<b>\$ 4,597,062.18</b>
29						
30		100	12,063	1,071.50	459.00	1,530.50
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>145,801</b>	<b>79,798,552</b>	<b>\$ 1,562,257.75</b>	<b>\$ 3,036,334.93</b>	<b>\$ 4,598,592.68</b>
33						
34	<b>GRAND TOTAL</b>	<b>559,137</b>	<b>284,626,649</b>	<b>\$ 7,268,361.24</b>	<b>\$ 12,253,599.30</b>	<b>\$ 19,521,960.54</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - January 2020**

Member Billing January 2020		Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	JP RURALS	\$ 6.00	\$ -	\$ -	\$ 22,301.20	\$ 192,453.69
2	KENERGY	-	-	-	40,260.55	349,674.70
3	MEADE CO. RURALS	-	-	-	17,935.69	158,116.62
4						
5	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 80,497.44</b>	<b>\$ 700,245.01</b>
6						
7		\$ -	\$ -	\$ -	\$ 772.83	\$ 5,968.81
8		-	310.74	-	16.16	108.82
9		-	-	(106,589.61)	8,152.07	52,643.47
10		-	-	-	255.34	2,125.03
11		-	-	-	4,367.24	27,773.51
12		-	53.58	-	8.90	74.72
13		-	-	-	639.10	4,825.50
14		-	21.43	-	15.76	122.42
15		-	-	-	10,007.99	64,718.97
16		-	-	-	62.98	1,922.79
17		-	-	-	548.69	4,264.37
18		-	-	-	-	48.42
19		-	-	-	12.17	178.21
20		-	-	-	1,780.07	11,716.99
21		-	-	-	2,839.40	19,249.68
22		-	-	-	303.19	2,119.71
23		-	-	-	129.11	2,059.01
24		-	-	62.00	8.59	1,376.83
25		-	-	349.77	7.93	424.64
26		-	3,482.38	8,001.14	1,428.58	11,272.96
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 3,868.13</b>	<b>\$ (98,176.70)</b>	<b>\$ 31,356.10</b>	<b>\$ 212,994.86</b>
29						
30		-	-	-	4.74	70.69
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 3,868.13</b>	<b>\$ (98,176.70)</b>	<b>\$ 31,360.84</b>	<b>\$ 213,065.55</b>
33						
34	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 3,868.13</b>	<b>\$ (98,176.70)</b>	<b>\$ 111,858.28</b>	<b>\$ 913,310.56</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - January 2020**

Member Billing January 2020		Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1	JP RURALS	\$ 136,077.02	\$ 4,451,080.82	\$ (298,082.60)	\$ 4,152,998.22
2	KENERGY	245,661.08	8,087,287.20	(538,131.18)	7,549,156.02
3	MEADE CO. RURALS	109,439.68	3,656,926.07	(239,732.36)	3,417,193.71
4					
5	<b>TOTAL RURALS</b>	<b>\$ 491,177.78</b>	<b>\$ 16,195,294.09</b>	<b>\$ (1,075,946.14)</b>	<b>\$ 15,119,347.95</b>
6					
7		\$ 4,715.67	\$ 138,046.81	\$ (8,417.56)	\$ 129,629.25
8		98.60	2,827.44	(175.98)	2,651.46
9		49,742.12	1,217,539.71	(79,192.35)	1,138,347.36
10		1,558.05	49,147.65	(2,781.15)	46,366.50
11		26,647.92	642,346.58	(47,567.03)	594,779.55
12		54.29	1,781.60	(96.91)	1,684.69
13		3,899.62	111,604.39	(6,960.88)	104,643.51
14		96.14	2,852.75	(171.63)	2,681.12
15		61,066.57	1,496,822.41	(109,004.94)	1,387,817.47
16		384.30	44,470.29	(685.97)	43,784.32
17		3,347.98	98,626.56	(5,976.22)	92,650.34
18		-	1,119.92	-	1,119.92
19		74.25	4,121.56	(132.53)	3,989.03
20		10,861.59	270,990.87	(19,388.13)	251,602.74
21		17,325.40	445,207.14	(30,926.17)	414,280.97
22		1,849.98	49,024.74	(3,302.27)	45,722.47
23		787.78	47,620.93	(1,406.19)	46,214.74
24		52.44	31,905.34	(93.59)	31,811.75
25		48.41	10,170.90	(86.40)	10,084.50
26		8,716.88	272,204.97	(15,559.77)	256,645.20
27					
28	<b>Sub-Total Kenergy Industrials</b>	<b>\$ 191,327.99</b>	<b>\$ 4,938,432.56</b>	<b>\$ (331,925.67)</b>	<b>\$ 4,606,506.89</b>
29					
30		28.93	1,634.86	(51.65)	1,583.21
31					
32	<b>TOTAL INDUSTRIALS</b>	<b>\$ 191,356.92</b>	<b>\$ 4,940,067.42</b>	<b>\$ (331,977.32)</b>	<b>\$ 4,608,090.10</b>
33					
34	<b>GRAND TOTAL</b>	<b>\$ 682,534.70</b>	<b>\$ 21,135,361.51</b>	<b>\$ (1,407,923.46)</b>	<b>\$ 19,727,438.05</b>

Case No. 2020-00250

Attachment for Response to PSC 1-13

Witness: Jennifer M. Stone

Page 9 of 30



**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - February 2020**

Member Billing February 2020		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	JP RURALS	118,661	52,692,558	1,638,115.11	\$ 2,371,165.11	\$ 4,009,280.22
2	KENERGY	220,215	96,334,462	3,040,068.08	4,335,050.79	7,375,118.87
3	MEADE CO. RURALS	104,935	43,685,734	1,448,627.68	1,965,858.03	3,414,485.71
4						
5	<b>TOTAL RURALS</b>	<b>443,811</b>	<b>192,712,754</b>	<b>\$ 6,126,810.87</b>	<b>\$ 8,672,073.93</b>	<b>\$ 14,798,884.80</b>
6						
7		4,838	1,976,687	51,839.17	\$ 75,212.94	\$ 127,052.11
8		63	38,128	675.05	1,450.77	2,125.82
9		39,600	20,121,294	424,314.00	765,615.24	1,189,929.24
10		1,689	577,797	18,097.64	21,985.18	40,082.82
11		15,000	10,434,194	160,725.00	397,021.08	557,746.08
12		60	22,507	642.90	856.39	1,499.29
13		3,963	1,271,540	42,463.55	48,382.10	90,845.65
14		100	36,937	1,071.50	1,405.45	2,476.95
15		36,504	22,852,882	391,140.36	869,552.16	1,260,692.52
16		3,360	158,605	36,002.40	6,034.92	42,037.32
17		3,417	1,293,844	36,613.16	49,230.76	85,843.92
18		100	0	1,071.50	-	1,071.50
19		250	29,589	2,678.75	1,125.86	3,804.61
20		7,303	4,201,031	78,251.65	159,849.23	238,100.88
21		11,677	6,050,459	125,119.06	230,219.96	355,339.02
22		1,596	734,109	17,101.14	27,932.85	45,033.99
23		3,000	265,031	32,145.00	10,084.43	42,229.43
24		2,760	17,932	29,573.40	682.31	30,255.71
25		800	22,468	8,572.00	854.91	9,426.91
26		9,059	3,259,907	97,067.19	124,039.46	221,106.65
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>145,139</b>	<b>73,364,941</b>	<b>\$ 1,555,164.42</b>	<b>\$ 2,791,536.00</b>	<b>\$ 4,346,700.42</b>
29						
30		100	6,296	1,071.50	239.56	1,311.06
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>145,239</b>	<b>73,371,237</b>	<b>\$ 1,556,235.92</b>	<b>\$ 2,791,775.56</b>	<b>\$ 4,348,011.48</b>
33						
34	<b>GRAND TOTAL</b>	<b>589,050</b>	<b>266,083,991</b>	<b>\$ 7,683,046.79</b>	<b>\$ 11,463,849.49</b>	<b>\$ 19,146,896.28</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - February 2020**

Member Billing February 2020		Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	JP RURALS	\$ 6.00	\$ -	\$ -	\$ 3,425.02	\$ 176,449.79
2	KENERGY	-	-	-	6,261.74	324,519.11
3	MEADE CO. RURALS	-	-	-	2,839.57	150,147.77
4						
5	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 12,526.33</b>	<b>\$ 651,116.67</b>
6						
7		\$ -	\$ -	\$ -	\$ 128.48	\$ 5,623.83
8		-	471.46	-	2.48	94.63
9		-	-	(106,589.61)	1,307.88	48,295.89
10		-	203.59	-	37.56	1,769.41
11		-	-	-	678.22	24,872.50
12		-	53.58	-	1.46	66.28
13		-	-	-	82.65	4,006.29
14		-	21.43	-	2.40	109.47
15		-	-	-	1,485.44	56,143.32
16		-	-	-	10.31	1,808.72
17		-	-	-	84.10	3,795.41
18		-	-	-	-	45.68
19		-	-	-	1.92	165.30
20		-	-	-	273.07	10,591.43
21		-	-	-	393.28	15,783.53
22		-	-	-	47.72	1,996.90
23		-	-	-	17.23	1,828.08
24		-	-	60.54	1.17	1,291.70
25		-	-	38.71	1.46	404.23
26		-	-	7,599.21	211.89	9,768.15
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 750.06</b>	<b>\$ (98,891.15)</b>	<b>\$ 4,768.72</b>	<b>\$ 188,460.75</b>
29						
30		-	-	-	0.41	56.55
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 750.06</b>	<b>\$ (98,891.15)</b>	<b>\$ 4,769.13</b>	<b>\$ 188,517.30</b>
33						
34	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 750.06</b>	<b>\$ (98,891.15)</b>	<b>\$ 17,295.46</b>	<b>\$ 839,633.97</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - February 2020**

Member Billing February 2020	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1 JP RURALS	\$ 126,356.75	\$ 4,315,517.78	\$ (269,861.90)	\$ 4,045,655.88
2 KENERGY	231,010.04	7,936,909.76	(493,371.35)	7,443,538.41
3 MEADE CO. RURALS	104,758.39	3,672,231.44	(223,733.95)	3,448,497.49
4				
5 <b>TOTAL RURALS</b>	<b>\$ 462,125.18</b>	<b>\$ 15,924,658.98</b>	<b>\$ (986,967.20)</b>	<b>\$ 14,937,691.78</b>
6				
7	\$ 4,740.10	\$ 137,544.52	\$ (8,480.45)	\$ 129,064.07
8	91.43	2,785.82	(163.58)	2,622.24
9	48,250.86	1,181,194.26	(76,354.34)	1,104,839.92
10	1,385.56	43,478.94	(2,478.89)	41,000.05
11	25,021.20	608,318.00	(44,765.13)	563,552.87
12	53.97	1,674.58	(96.56)	1,578.02
13	3,049.15	97,983.74	(5,455.18)	92,528.56
14	88.57	2,698.82	(158.48)	2,540.34
15	54,801.21	1,373,122.49	(98,044.17)	1,275,078.32
16	380.33	44,236.68	(680.43)	43,556.25
17	3,102.64	92,826.07	(5,550.91)	87,275.16
18	-	1,117.18	-	1,117.18
19	70.95	4,042.78	(126.93)	3,915.85
20	10,074.07	259,039.45	(18,023.39)	241,016.06
21	14,509.00	386,024.83	(25,957.88)	360,066.95
22	1,760.39	48,839.00	(3,149.51)	45,689.49
23	635.54	44,710.28	(1,137.04)	43,573.24
24	43.00	31,652.12	(76.91)	31,575.21
25	53.88	9,925.19	(96.38)	9,828.81
26	7,817.26	246,503.16	(13,985.73)	232,517.43
27				
28 <b>Sub-Total Kenergy Industrials</b>	<b>\$ 175,929.11</b>	<b>\$ 4,617,717.91</b>	<b>\$ (304,781.89)</b>	<b>\$ 4,312,936.02</b>
29				
30	15.10	1,383.12	(27.02)	1,356.10
31				
32 <b>TOTAL INDUSTRIALS</b>	<b>\$ 175,944.21</b>	<b>\$ 4,619,101.03</b>	<b>\$ (304,808.91)</b>	<b>\$ 4,314,292.12</b>
33				
34 <b>GRAND TOTAL</b>	<b>\$ 638,069.39</b>	<b>\$ 20,543,760.01</b>	<b>\$ (1,291,776.11)</b>	<b>\$ 19,251,983.90</b>

Case No. 2020-00250

Attachment for Response to PSC 1-13

Witness: Jennifer M. Stone

Page 12 of 30

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - March 2020**

Member Billing March 2020		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	JP RURALS	80,737	44,363,533	1,114,574.29	\$ 1,996,358.99	\$ 3,110,933.28
2	KENERGY	159,718	81,745,696	2,204,906.99	3,678,556.32	5,883,463.31
3	MEADE CO. RURALS	81,649	34,837,635	1,127,164.45	1,567,693.58	2,694,858.03
4						
5	<b>TOTAL RURALS</b>	<b>322,104</b>	<b>160,946,864</b>	<b>\$ 4,446,645.73</b>	<b>\$ 7,242,608.89</b>	<b>\$ 11,689,254.62</b>
6						
7		4,929	2,081,875	52,814.24	\$ 79,215.34	\$ 132,029.58
8		91	21,487	975.07	817.58	1,792.65
9		39,600	19,154,537	424,314.00	728,830.13	1,153,144.13
10		1,674	605,408	17,936.91	23,035.77	40,972.68
11		15,000	9,889,308	160,725.00	376,288.17	537,013.17
12		65	25,379	696.48	965.67	1,662.15
13		3,068	1,170,605	32,873.62	44,541.52	77,415.14
14		100	24,440	1,071.50	929.94	2,001.44
15		36,331	25,155,389	389,286.67	957,162.55	1,346,449.22
16		3,360	46,891	36,002.40	1,784.20	37,786.60
17		3,342	1,409,023	35,809.53	53,613.33	89,422.86
18		100	0	1,071.50	-	1,071.50
19		250	29,384	2,678.75	1,118.06	3,796.81
20		6,985	4,406,875	74,844.28	167,681.59	242,525.87
21		12,604	6,921,334	135,051.86	263,356.76	398,408.62
22		1,374	760,375	14,722.41	28,932.27	43,654.68
23		3,000	210,250	32,145.00	8,000.01	40,145.01
24		2,760	14,524	29,573.40	552.64	30,126.04
25		800	24,306	8,572.00	924.84	9,496.84
26		7,200	1,037,624	77,148.00	39,481.59	116,629.59
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>142,633</b>	<b>72,989,014</b>	<b>\$ 1,528,312.62</b>	<b>\$ 2,777,231.96</b>	<b>\$ 4,305,544.58</b>
29						
30		100	4,391	1,071.50	167.08	1,238.58
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>142,733</b>	<b>72,993,405</b>	<b>\$ 1,529,384.12</b>	<b>\$ 2,777,399.04</b>	<b>\$ 4,306,783.16</b>
33						
34	<b>GRAND TOTAL</b>	<b>464,837</b>	<b>233,940,269</b>	<b>\$ 5,976,029.85</b>	<b>\$ 10,020,007.93</b>	<b>\$ 15,996,037.78</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - March 2020**

Member Billing March 2020		Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (21,383.22)	\$ 171,249.61
2	KENERGY	-	-	-	(39,401.43)	323,649.60
3	MEADE CO. RURALS	-	-	-	(16,791.74)	147,976.81
4						
5	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (77,576.39)</b>	<b>\$ 642,876.02</b>
6						
7		\$ -	\$ -	\$ -	\$ (1,003.46)	\$ 7,288.36
8		-	300.02	-	(10.36)	98.26
9		-	-	(106,589.61)	(9,232.49)	58,044.67
10		-	-	-	(291.81)	2,257.62
11		-	-	-	(4,766.65)	29,790.39
12		-	117.87	-	(12.23)	91.67
13		-	-	-	(564.23)	4,268.36
14		-	-	-	(11.78)	109.75
15		-	-	-	(12,124.90)	74,730.19
16		-	-	-	(22.60)	2,029.56
17		-	-	-	(679.15)	4,936.26
18		-	-	-	-	57.41
19		-	-	-	(14.16)	206.46
20		-	-	-	(2,124.11)	13,447.84
21		-	-	-	(3,336.08)	22,058.75
22		-	-	-	(366.50)	2,417.24
23		-	-	-	(101.34)	2,172.70
24		-	-	58.06	(7.00)	1,615.75
25		-	-	385.09	(11.72)	511.37
26		-	-	13,689.37	(500.13)	6,355.96
27						
28	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 417.89</b>	<b>\$ (92,457.09)</b>	<b>\$ (35,180.70)</b>	<b>\$ 232,488.57</b>
29						
30		-	-	-	(2.12)	66.82
31						
32	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 417.89</b>	<b>\$ (92,457.09)</b>	<b>\$ (35,182.82)</b>	<b>\$ 232,555.39</b>
33						
34	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 417.89</b>	<b>\$ (92,457.09)</b>	<b>\$ (112,759.21)</b>	<b>\$ 875,431.41</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - March 2020**

Member Billing March 2020	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1 JP RURALS	\$ 106,383.75	\$ 3,367,189.42	\$ (151,712.97)	\$ 3,215,476.45
2 KENERGY	196,026.18	6,363,737.66	(279,551.25)	6,084,186.41
3 MEADE CO. RURALS	83,540.65	2,909,583.75	(119,136.61)	2,790,447.14
4				
5 <b>TOTAL RURALS</b>	<b>\$ 385,950.58</b>	<b>\$ 12,640,510.83</b>	<b>\$ (550,400.83)</b>	<b>\$ 12,090,110.00</b>
6				
7	\$ 4,992.34	\$ 143,306.82	\$ (4,123.85)	\$ 139,182.97
8	51.53	2,232.10	(42.56)	2,189.54
9	45,932.58	1,141,299.28	(37,935.59)	1,103,363.69
10	1,451.77	44,390.26	(1,199.22)	43,191.04
11	23,714.56	585,751.47	(19,589.05)	566,162.42
12	60.86	1,920.32	(50.28)	1,870.04
13	2,807.11	83,926.38	(2,318.76)	81,607.62
14	58.61	2,158.02	(48.42)	2,109.60
15	60,322.62	1,469,377.13	(49,828.58)	1,419,548.55
16	112.44	39,906.00	(92.88)	39,813.12
17	3,378.84	97,058.81	(2,791.05)	94,267.76
18	-	1,128.91	-	1,128.91
19	70.46	4,059.57	(58.19)	4,001.38
20	10,567.69	264,417.29	(8,729.27)	255,688.02
21	16,597.36	433,728.65	(13,710.01)	420,018.64
22	1,823.38	47,528.80	(1,506.18)	46,022.62
23	504.18	42,720.55	(416.46)	42,304.09
24	34.83	31,827.68	(28.76)	31,798.92
25	58.29	10,439.87	(48.13)	10,391.74
26	2,488.22	138,663.01	(2,055.34)	136,607.67
27				
28 <b>Sub-Total Kenergy Industrials</b>	<b>\$ 175,027.67</b>	<b>\$ 4,585,840.92</b>	<b>\$ (144,572.58)</b>	<b>\$ 4,441,268.34</b>
29				
30	10.53	1,313.81	(8.70)	1,305.11
31				
32 <b>TOTAL INDUSTRIALS</b>	<b>\$ 175,038.20</b>	<b>\$ 4,587,154.73</b>	<b>\$ (144,581.28)</b>	<b>\$ 4,442,573.45</b>
33				
34 <b>GRAND TOTAL</b>	<b>\$ 560,988.78</b>	<b>\$ 17,227,665.56</b>	<b>\$ (694,982.11)</b>	<b>\$ 16,532,683.45</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - April 2020**

Member Billing April 2020		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	JP RURALS	80,082	37,977,787	1,105,532.01	\$ 1,709,000.42	\$ 2,814,532.43
2	KENERGY	155,166	70,984,041	2,142,066.63	3,194,281.85	5,336,348.48
3	MEADE CO. RURALS	55,662	30,057,483	768,413.91	1,352,586.74	2,121,000.65
4						
5	<b>TOTAL RURALS</b>	<b>290,910</b>	<b>139,019,311</b>	<b>\$ 4,016,012.55</b>	<b>\$ 6,255,869.01</b>	<b>\$ 10,271,881.56</b>
6						
7		4,748	1,419,688	50,874.82	\$ 54,019.13	\$ 104,893.95
8		3	21	32.15	0.80	32.95
9		40,800	8,782,572	437,172.00	334,176.86	771,348.86
10		1,717	509,226	18,397.66	19,376.05	37,773.71
11		15,000	10,799,182	160,725.00	410,908.88	571,633.88
12		60	24,067	642.90	915.75	1,558.65
13		3,131	1,067,296	33,548.67	40,610.61	74,159.28
14		100	16,949	1,071.50	644.91	1,716.41
15		36,115	24,398,284	386,972.23	928,354.71	1,315,326.94
16		0	0	-	-	-
17		101	38,637	1,082.22	1,470.14	2,552.36
18		3,357	1,329,180	35,970.26	50,575.30	86,545.56
19		100	0	1,071.50	-	1,071.50
20		250	26,593	2,678.75	1,011.86	3,690.61
21		7,212	4,221,094	77,276.58	160,612.63	237,889.21
22		12,908	6,917,901	138,309.22	263,226.13	401,535.35
23		2,250	913,697	24,108.75	34,766.17	58,874.92
24		3,000	128,406	32,145.00	4,885.85	37,030.85
25		2,760	12,988	29,573.40	494.19	30,067.59
26		800	14,003	8,572.00	532.81	9,104.81
27		7,200	868,441	77,148.00	33,044.18	110,192.18
28						
29	<b>Sub-Total Kenergy Industrials</b>	<b>141,612</b>	<b>61,488,225</b>	<b>\$ 1,517,372.61</b>	<b>\$ 2,339,626.96</b>	<b>\$ 3,856,999.57</b>
30						
31		100	3,719	1,071.50	141.51	1,213.01
32						
33	<b>TOTAL INDUSTRIALS</b>	<b>141,712</b>	<b>61,491,944</b>	<b>\$ 1,518,444.11</b>	<b>\$ 2,339,768.47</b>	<b>\$ 3,858,212.58</b>
34						
35	<b>GRAND TOTAL</b>	<b>432,622</b>	<b>200,511,255</b>	<b>\$ 5,534,456.66</b>	<b>\$ 8,595,637.48</b>	<b>\$ 14,130,094.14</b>

Case No. 2020-00250

Attachment for Response to PSC 1-13

Witness: Jennifer M. Stone

Page 16 of 30

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - April 2020**

Member Billing April 2020		Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (49,181.23)	\$ 138,734.56
2	KENERGY	-	-	-	(91,924.33)	262,985.73
3	MEADE CO. RURALS	-	-	-	(38,924.44)	104,625.86
4						
5	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (180,030.00)</b>	<b>\$ 506,346.15</b>
6						
7		\$ -	\$ -	\$ -	\$ (1,838.50)	\$ 5,170.69
8		-	-	-	(0.03)	1.60
9		-	-	(118,161.81)	(11,373.43)	32,195.37
10		-	-	-	(659.45)	1,861.92
11		-	-	-	(13,984.94)	28,342.42
12		-	75.01	-	(31.17)	76.99
13		-	-	-	(1,382.15)	3,659.05
14		-	-	-	(21.95)	84.27
15		-	-	-	(31,595.78)	65,191.64
16		-	-	-	-	-
17		-	-	-	(50.03)	126.04
18		-	407.17	-	(1,721.29)	4,274.67
19		-	-	-	-	52.04
20		-	-	-	(34.44)	180.68
21		-	-	-	(5,466.32)	11,780.26
22		-	-	-	(8,958.68)	19,872.92
23		-	-	-	(1,183.24)	2,908.47
24		-	-	-	(166.29)	1,805.44
25		-	-	61.71	(16.82)	1,461.06
26		-	-	(25.53)	(18.13)	442.97
27		-	-	2,085.70	(1,124.63)	5,398.49
28						
29	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 482.18</b>	<b>\$ (116,039.93)</b>	<b>\$ (79,627.27)</b>	<b>\$ 184,886.99</b>
30						
31		-	-	-	(4.82)	59.11
32						
33	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 482.18</b>	<b>\$ (116,039.93)</b>	<b>\$ (79,632.09)</b>	<b>\$ 184,946.10</b>
34						
35	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 482.18</b>	<b>\$ (116,039.93)</b>	<b>\$ (259,662.09)</b>	<b>\$ 691,292.25</b>

Case No. 2020-00250

Attachment for Response to PSC 1-13

Witness: Jennifer M. Stone

Page 17 of 30



**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - April 2020**

Member Billing April 2020		Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1	JP RURALS	\$ 91,070.73	\$ 2,995,162.49	\$ (160,678.35)	\$ 2,834,484.14
2	KENERGY	170,219.73	5,677,629.61	(300,322.89)	5,377,306.72
3	MEADE CO. RURALS	72,077.84	2,258,779.91	(127,168.73)	2,131,611.18
4					
5	<b>TOTAL RURALS</b>	<b>\$ 333,368.30</b>	<b>\$ 10,931,572.01</b>	<b>\$ (588,169.97)</b>	<b>\$ 10,343,402.04</b>
6					
7		\$ 3,404.41	\$ 111,630.55	\$ (3,566.29)	\$ 108,064.26
8		0.05	34.57	(0.05)	34.52
9		21,060.61	695,069.60	(22,061.98)	673,007.62
10		1,221.12	40,197.30	(1,279.19)	38,918.11
11		25,896.44	611,887.80	(27,127.75)	584,760.05
12		57.71	1,737.19	(60.45)	1,676.74
13		2,559.38	78,995.56	(2,681.06)	76,314.50
14		40.64	1,819.37	(42.58)	1,776.79
15		58,507.09	1,407,429.89	(61,288.94)	1,346,140.95
16		-	-	-	-
17		92.65	2,721.02	(97.05)	2,623.97
18		3,187.37	92,693.48	(3,338.93)	89,354.55
19		-	1,123.54	-	1,123.54
20		63.77	3,900.62	(66.80)	3,833.82
21		10,122.18	254,325.33	(10,603.46)	243,721.87
22		16,589.13	429,038.72	(17,377.90)	411,660.82
23		2,191.05	62,791.20	(2,295.23)	60,495.97
24		307.92	38,977.92	(322.55)	38,655.37
25		31.15	31,604.69	(32.62)	31,572.07
26		33.58	9,537.70	(35.17)	9,502.53
27		2,082.52	118,634.26	(2,181.53)	116,452.73
28					
29	<b>Sub-Total Kenergy Industrials</b>	<b>\$ 147,448.77</b>	<b>\$ 3,994,150.31</b>	<b>\$ (154,459.53)</b>	<b>\$ 3,839,690.78</b>
30					
31		8.92	1,276.22	(9.35)	1,266.87
32					
33	<b>TOTAL INDUSTRIALS</b>	<b>\$ 147,457.69</b>	<b>\$ 3,995,426.53</b>	<b>\$ (154,468.88)</b>	<b>\$ 3,840,957.65</b>
34					
35	<b>GRAND TOTAL</b>	<b>\$ 480,825.99</b>	<b>\$ 14,926,998.54</b>	<b>\$ (742,638.85)</b>	<b>\$ 14,184,359.69</b>

Case No. 2020-00250

Attachment for Response to PSC 1-13

Witness: Jennifer M. Stone

Page 18 of 30

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 November 2019**

1	November 2019 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	KENERGY-DOMTAR COGEN	4,399	\$ 122,546.60
5	ASSOCIATED ELECTRIC COOPERATIVE, INC.	162	\$ 4,245.26
6	ADM INVESTOR SERVICES		\$ (42,214.50)
7	MISO	183,296	\$ 4,791,809.90
8	NORTHEAST POWER		\$ 333,233.71
9	CITY OF OWENSBORO, KY		\$ 4,779.18
10	CITY OF WAYNE, NE		\$ 51,341.59
11	CITY OF WAKEFIELD, NE		\$ 43,463.47
12	KENTUCKY MUNICIPAL ENERGY AGENCY	54,275.000	\$ 2,726,292.25
13		<hr/>	
14	TOTAL SPECIAL SALES - ENERGY	242,132	\$ 8,035,497.46
15			
16	SPECIAL SALES - BILATERAL		
17	MACQUARIE ENERGY		\$ 981,640.00
18	DTE ENERGY TRADING		\$ (475,640.00)
19	EDF TRADING NORTH AMERICA		\$ 548,800.00
20	MORGAN STANLEY CAPITAL GROUP		\$ 1,105,600.00
21	NEXTERA ENERGY POWER MARKETING		\$ 1,016,000.00
22	MISO - CONTRA REVENUE		\$ (3,276,693.09)
23		<hr/>	
24	TOTAL SPECIAL SALES - BILATERAL		\$ (100,293.09)

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 November 2019**

1	November 2019 - Other Sales	MWH	REVENUE
2	-----	-----	-----
3	SPECIAL SALES - CAPACITY		
4	CITY OF HANNIBAL, MO - CAPACITY SALES		\$ 62,500.00
5	CITY OF KAHOKA, MO - CAPACITY SALES		\$ 500.00
6	CITY OF CALIFORNIA, MO - CAPACITY SALES		\$ 29,500.00
7	CITY OF CENTRALIA, MO - CAPACITY SALES		\$ 24,250.00
8	CITY OF MARCELINE, MO - CAPACITY SALES		\$ 7,750.00
9	DTE ENERGY TRADING - CAPACITY SALES		\$ 285,047.00
10	MISO - CAPACITY SALES		\$ (1,121.40)
11	NEXTERA ENERGY POWER MARKETING - CAPACITY SALES		\$ 318,500.00
12		-----	-----
13	TOTAL SPECIAL SALES - BILATERAL		\$ 726,925.60
14		-----	-----
15	TOTAL	242,132	\$ 8,662,129.97
		=====	=====

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Other Sales  
December 2019**

1	December 2019 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - ENERGY		
4	KENERGY-DOMTAR COGEN	8,698	\$ 205,714.90
5	SOUTHERN ILLINOIS POWER COOPERATIVE	1,800	\$ 42,418.50
6	ASSOCIATED ELECTRIC COOPERATIVE, INC.		\$ (1,132.93)
7	ADM INVESTOR SERVICES		\$ 32,019.50
8	MISO	89,850	\$ 2,102,977.60
9	NORTHEAST POWER		\$ 393,810.40
10	CITY OF OWENSBORO, KY		\$ 7,635.60
11	CITY OF WAYNE, NE		\$ 55,291.99
12	CITY OF WAKEFIELD, NE		\$ 46,346.18
13	KENTUCKY MUNICIPAL ENERGY AGENCY	37,375	\$ 2,305,753.25
14			
15	TOTAL SPECIAL SALES - ENERGY	137,723	\$ 5,190,834.99
16			
17	SPECIAL SALES - BILATERAL		
18	MACQUARIE ENERGY		\$ 516,120.00
19	EDF TRADING NORTH AMERICA		\$ 576,240.00
20	MORGAN STANLEY CAPITAL GROUP		\$ 1,160,880.00
21	NEXTERA ENERGY POWER MARKETING		\$ 1,036,320.00
22	MISO - CONTRA REVENUE		\$ (2,697,146.17)
23			
24	TOTAL SPECIAL SALES - BILATERAL		\$ 592,413.83
25			

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 December 2019**

1	December 2019 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	CITY OF HANNIBAL, MO - CAPACITY SALES		\$ 62,500.00
5	CITY OF KAHOKA, MO - CAPACITY SALES		\$ 500.00
6	CITY OF CALIFORNIA, MO - CAPACITY SALES		\$ 29,500.00
7	CITY OF CENTRALIA, MO - CAPACITY SALES		\$ 24,250.00
8	CITY OF MARCELINE, MO - CAPACITY SALES		\$ 7,750.00
9	DTE ENERGY TRADING - CAPACITY SALES		\$ 285,047.00
10	MISO - CAPACITY SALES		\$ (1,158.78)
11	NEXTERA ENERGY POWER MARKETING - CAPACITY SALES		\$ 318,500.00
12			
13	TOTAL SPECIAL SALES - BILATERAL		\$ 726,888.22
14			
15	TOTAL	<u>137,723</u>	<u>\$ 6,510,137.04</u>

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 January 2020**

1	January 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - ENERGY		
4	KENERGY-DOMTAR COGEN	6,273	\$ 182,747.29
5	ADM INVESTOR SERVICES		\$ 697,378.50
6	PJM INTERCONNECTION		\$ (24.59)
7	EXELON GENERATION CO. LLC		\$ 566,440.00
8	MACQUARIE ENERGY		\$ 107,520.00
9	MISO	66,856	\$ 1,543,704.56
10	NORTHEAST POWER		\$ 636,915.10
11	CITY OF OWENSBORO, KY		\$ 4,035.66
12	CITY OF WAYNE, NE		\$ 77,428.32
13	CITY OF WAKEFIELD, NE		\$ 50,429.28
14	KENTUCKY MUNICIPAL ENERGY AGENCY	23,775	\$ 2,012,516.75
15			
16	TOTAL SPECIAL SALES - ENERGY	96,904	\$ 5,879,090.87
17			
18	SPECIAL SALES - BILATERAL		
19	EDF TRADING NORTH AMERICA		\$ 965,300.00
20	MISO - CONTRA REVENUE		\$ (1,273,322.91)
21			
22	TOTAL SPECIAL SALES - BILATERAL		\$ (308,022.91)
23			

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 January 2020**

1	January 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	CITY OF HANNIBAL, MO - CAPACITY SALES		\$ 62,500.00
5	CITY OF KAHOKA, MO - CAPACITY SALES		\$ 500.00
6	CITY OF CALIFORNIA, MO - CAPACITY SALES		\$ 29,500.00
7	CITY OF CENTRALIA, MO - CAPACITY SALES		\$ 24,250.00
8	CITY OF MARCELINE, MO - CAPACITY SALES		\$ 7,750.00
9	DTE ENERGY TRADING-CAPACITY SALES		\$ 285,047.00
10	MISO - CAPACITY SALES		\$ (1,158.75)
11	NEXTERA ENERGY POWER MARKETING - CAPACITY SALES		\$ 318,500.00
12			
13	TOTAL SPECIAL SALES - BILATERAL		\$ 726,888.25
14			
15	TOTAL	96,904	\$ 6,297,956.21

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 February 2020**

1	February 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - ENERGY		
4	KENERGY-DOMTAR COGEN	3,397	\$ 83,990.88
5	ADM INVESTOR SERVICES		\$ 703,042.50
6	MISO	92,192	\$ 2,166,230.74
7	NORTHEAST POWER		\$ 565,633.49
8	CITY OF OWENSBORO, KY		\$ 3,567.01
9	CITY OF WAYNE, NE		\$ 67,084.87
10	CITY OF WAKEFIELD, NE		\$ 51,791.89
11	KENTUCKY MUNICIPAL ENERGY AGENCY	12,425	\$ 1,735,213.75
12			
13	TOTAL SPECIAL SALES - ENERGY	108,014	\$ 5,376,555.13
14			
15	SPECIAL SALES - BILATERAL		
16	EDF TRADING NORTH AMERICA		\$ 925,900.00
17	MISO - CONTRA REVENUE		\$ (393,834.59)
18	EXELON GENERATION CO. LLC		\$ 543,320.00
19	MAQUARIE ENERGY - CONTRA REVENUE		\$ (836,600.00)
20			
21	TOTAL SPECIAL SALES - BILATERAL		\$ 238,785.41
22			



**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 February 2020**

1	February 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	CITY OF HANNIBAL, MO - CAPACITY SALES		\$ 62,500.00
5	CITY OF KAHOKA, MO - CAPACITY SALES		\$ 500.00
6	CITY OF CALIFORNIA, MO - CAPACITY SALES		\$ 29,500.00
7	CITY OF CENTRALIA, MO - CAPACITY SALES		\$ 24,250.00
8	CITY OF MARCELINE, MO - CAPACITY SALES		\$ 7,750.00
9	VOLTUS INC. - CAPACITY SALES		\$ (37,865.00)
10	MACQUARIE ENERGY		\$ 107,520.00
11	DTE ENERGY TRADING - CAPACITY SALES		\$ 285,047.00
12	MISO - CAPACITY SALES		\$ (1,084.02)
13	NEXTERA ENERGY POWER MARKETING - CAPACITY SALES		\$ 318,500.00
14			
15	TOTAL SPECIAL SALES - BILATERAL		\$ 796,617.98
16			
17	TOTAL	108,014	\$ 6,411,958.52

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 March 2020**

1	March 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - ENERGY		
4	KENERGY-DOMTAR COGEN	14,467	\$ 324,451.17
5	MISO	21,970	\$ 464,312.66
6	NORTHEAST POWER		\$ 434,643.56
7	CITY OF OWENSBORO, KY		\$ 16,742.10
8	CITY OF WAYNE, NE		\$ 39,232.79
9	CITY OF WAKEFIELD, NE		\$ 43,165.33
10	KENTUCKY MUNICIPAL ENERGY AGENCY	7,075	\$ 1,608,183.00
11			
12	TOTAL SPECIAL SALES - ENERGY	43,512	\$ 2,930,730.61
13			
14	SPECIAL SALES - BILATERAL		
15	EDF TRADING NORTH AMERICA		\$ 965,300.00
16	MISO - CONTRA REVENUE		\$ (35,858.56)
17	MACQUARIE ENERGY - CONTRA REVENUE		\$ (872,200.00)
18			
19	TOTAL SPECIAL SALES - BILATERAL		\$ 57,241.44
20			

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 March 2020**

1	March 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	CITY OF HANNIBAL, MO - CAPACITY SALES		\$ 62,500.00
5	CITY OF KAHOKA, MO - CAPACITY SALES		\$ 500.00
6	CITY OF CALIFORNIA, MO - CAPACITY SALES		\$ 29,500.00
7	CITY OF CENTRALIA, MO - CAPACITY SALES		\$ 24,250.00
8	CITY OF MARCELINE, MO - CAPACITY SALES		\$ 7,750.00
9	VOLTUS INC. - CAPACITY SALES		\$ (18,932.50)
10	DTE ENERGY TRADING - CAPACITY SALES		\$ 285,047.00
11	MISO - CAPACITY SALES		\$ (1,158.78)
12	NEXTERA ENERGY POWER MARKETING - CAPACITY SALES		\$ 318,500.00
13			
14	TOTAL SPECIAL SALES - BILATERAL		\$ 707,955.72
15			
16	TOTAL	<u>43,512</u>	<u>\$ 3,695,927.77</u>

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 April 2020**

1	April 2020 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	KENERGY-DOMTAR COGEN	8,883	\$ 188,000.90
5	MISO	46,445	\$ 887,739.65
6	NORTHEAST POWER		\$ 444,395.57
7	CITY OF OWENSBORO, KY		\$ 217.43
8	CITY OF WAYNE, NE		\$ 39,562.96
9	CITY OF WAKEFIELD, NE		\$ 51,138.55
10	KENTUCKY MUNICIPAL ENERGY AGENCY	3,025	\$ 1,502,906.25
11	<hr/>		
12	TOTAL SPECIAL SALES - ENERGY	58,353	\$ 3,113,961.31
13	<hr/>		
14	SPECIAL SALES - BILATERAL		
15	EDF TRADING NORTH AMERICA		\$ 906,200.00
16	MISO - CONTRA REVENUE		\$ (4,028.29)
17	MACQUARIE ENERGY - CONTRA REVENUE		\$ (818,800.00)
18	<hr/>		
19	TOTAL SPECIAL SALES - BILATERAL		\$ 83,371.71
20	<hr/>		

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 April 2020**

1	April 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	CITY OF HANNIBAL, MO - CAPACITY SALES		\$ 62,500.00
5	CITY OF KAHOKA, MO - CAPACITY SALES		\$ 500.00
6	CITY OF CALIFORNIA, MO - CAPACITY SALES		\$ 29,500.00
7	CITY OF CENTRALIA, MO - CAPACITY SALES		\$ 24,250.00
8	CITY OF MARCELINE, MO - CAPACITY SALES		\$ 7,750.00
9	VOLTUS INC. - CAPACITY SALES		\$ (18,932.50)
10	DTE ENERGY TRADING - CAPACITY SALES		\$ 285,047.00
11	MISO - CAPACITY SALES		\$ (1,121.40)
12	NEXTERA ENERGY POWER MARKETING - CAPACITY SALES		\$ 318,500.00
13			
14	TOTAL SPECIAL SALES - BILATERAL		\$ 707,993.10
15			
16	TOTAL	<u>58,353</u>	<u>\$ 3,905,326.12</u>

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 14)** *Describe the effect on the FAC calculation of line losses related*

2 *to:*

3 *a. intersystem sales when using a third-party transmission system,*

4 *and*

5 *b. intersystem sales when not using a third-party transmission system.*

6

7 **Response)**

8 a. Big Rivers had no intersystem sales during the period under review which  
9 used a third-party transmission system.

10 b. Line losses related to intersystem sales, which did not use a third-party  
11 transmission system, are included in Big Rivers' total System Losses  
12 reported on page 3 of its monthly Form A filing. Big Rivers calculates an  
13 overall system average fuel cost per kWh each month by dividing (1) the  
14 total cost of fuel for generation by (2) the net kWh generated less total  
15 System Losses. The overall system average fuel cost per kWh (which  
16 accounts for total System Losses, including losses related to intersystem

**Case No. 2020-00250**

**Response to PSC 1-14**

**Witnesses: Natalie R. Hankins (a. only) and**

**Jennifer M. Stone (b. only)**

**Page 1 of 2**

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 sales) is multiplied by the total intersystem sales volume to calculate the  
2 cost of fuel allocated to intersystem sales in Big Rivers' FAC calculation.

3

4

5 **Witnesses)** Natalie R. Hankins (*a. only*) and

6 Jennifer M. Stone (*b. only*)

7

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 15)** *Provide a list, in chronological order, showing by unit, any*  
2 *scheduled, actual, and forced outages for the period under review.*

3

4 **Response)** Please see the attached summary for the requested information  
5 regarding scheduled ("S"), actual ("A"), and forced ("F") outages. As noted in footnotes  
6 2 and 3 on page 5 of 5 of Big Rivers' response to Item 3, Big Rivers currently plans to  
7 retire Coleman Station and Reid Unit 1 in the coming months.

8

9

10 **Witness)** Ronald D. Gregory

11



**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Reid Station Unit #1 - Coal - 65MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019		No Outages							
December 2019		No Outages							
January 2020		No Outages							
February 2020		No Outages							
March 2020		No Outages							
April 2020		No Outages							

Reid Unit #1 was idled on  
 April 1, 2016, and  
 has not yet been restarted.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019	S, A	11/26/2019 09:00	11/26/2019 18:00	11/26/2019 9:00	11/26/2019 18:45	9:00		9:45	Maintenance outage to inspect new air compressor
December 2019		No Outages							
January 2020	S, A	1/31/2020 11:00	1/31/2020 12:30	1/31/2020 11:11	1/31/2020 12:30	1:30		1:19	Maintenance outage to install air compressor controls updates
February 2020		No Outages							
March 2020	F	3/4/2020 08:00	3/6/2020 8:00	3/4/2020 8:00	3/6/2020 8:00		48:00	48:00	Early start of scheduled outage to remove transformers in the Reid/HMPL switchyard
	S, A	3/6/2020 08:00	3/12/2020 14:00	3/6/2020 8:00	3/12/2020 14:23	150:00		150:23	Scheduled outage to remove transformers in the Reid/HMPL switchyard
April 2020		No Outages							

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Green Station Unit #1 - Coal/Pet coke - 231MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019	S, A	11/1/2019 00:00	11/16/2019 0:00	11/1/2019 0:00	11/12/2019 23:53	361:00		288:53	Continuation of Planned outage
	F			11/12/2019 23:53	11/13/2019 5:33		5:40	5:40	Starting failure forced outage from exceeding the 12 hour cold start limit, due to several issues that delayed the unit startup.
	F			11/15/2019 19:04	11/18/2019 22:21		75:17	75:17	The unit was taken offline to repair a waterwall tube leak. The leak from a crack at a previous weld, above the weld overlay area at the 6th floor on the east wall, caused steam washing damage to 6 other tubes.
December 2019	F			12/20/2019 10:19	12/22/2019 4:30		42:11	42:11	The unit was taken offline to repair a reheat tube leak. The failed tube caused steam washing damage to 5 other tubes.
January 2020	F			1/16/2020 3:30	1/16/2020 12:09		8:39	8:39	Starting failure forced outage from exceeding the 12 hour cold start limit, due to the Cold Reheat Drip Pot leaking through because linear control valve LCV 16-1 was stuck open and delayed start-up.
February 2020	F			2/19/2020 18:50	2/22/2020 1:54		55:04	55:04	The unit was removed from service, to repair a failed T-bar in the "A" air heater that had resulted in it locking up and causing seal damage.
March 2020	F			3/24/2020 22:49	3/25/2020 8:00		9:11	9:11	The unit was removed from service, due to the "B" Forced Draft Fan motor leads going to ground.
April 2020		No Outages							

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Green Station Unit #2 - Coal/Pet coke - 223MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019	F			11/6/2019 22:22	11/8/2019 15:10	40:48	40:48		The unit was removed from service to repair tube leaks. A total of 3 tube leaks were found during the boiler inspection, one in the Primary Superheat section, one in the Reheat section and one in the Screen Wall.
	F			11/14/2019 3:33	11/17/2019 0:22	68:49	68:49		The unit was removed from service to repair tube leaks. A tube leak was found in the Reheat Outlet Bank 23rd element. The leaking tube was repaired and three sections of other tubes nearby were replaced due to thinning.
	F			11/19/2019 22:56	11/21/2019 1:45	26:49	26:49		The unit was removed from service to repair tube leaks. A tube leak was found in the Reheat Outlet Bank 23rd element in the section put in during the previous outage. The leaking tube was repaired and three sections of other tubes nearby were also replaced.
December 2019		No Outages							
January 2020		No Outages							
February 2020		No Outages							
March 2020		No Outages							
April 2020		No Outages							

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Coleman Station Unit #1 - Coal - 150MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019		No Outages							
December 2019		No Outages							
January 2020		No Outages							
February 2020		No Outages							
March 2020		No Outages							
April 2020		No Outages							

Coleman Unit #1 was idled  
 on May 1, 2014, and  
 has not yet been returned to service.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Coleman Station Unit #2 - Coal - 138MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019		No Outages							
December 2019		No Outages							
January 2020		No Outages							
February 2020		No Outages							
March 2020		No Outages							
April 2020		No Outages							

Coleman Unit #2 was idled  
 on May 1, 2014, and  
 has not yet been returned to service.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Coleman Station Unit #3 - Coal - 155MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019		No Outages							
December 2019		No Outages							
January 2020		No Outages							
February 2020		No Outages							
March 2020		No Outages							
April 2020		No Outages							

Coleman Unit #3 was idled on May 8, 2014, and has not yet been returned to service.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**November 1 2019, through April 30, 2020**

Big Rivers Electric Corporation  
**Wilson Station - Unit #1 - Coal/Pet Coke - 417MW Net**  
 Nov 1 2019, through April 30 2020

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
November 2019	F			11/15/2019 14:51	11/15/2019 18:05		3:14	3:14	ETS (Emergency Trip System) Boiler Control Trip
	F			11/15/2019 21:02	11/16/2019 9:42		12:40	12:40	ETS (Emergency Trip System) Boiler Control Trip, primary air fan discharge damper position was identified as the cause of the trip and the actuator was replaced
December 2019	S, A	12/13/2019 23:00	12/16/2019 14:00	12/13/2019 22:59	12/16/2019 13:47	63:00		62:48	Maintenance Outage to clean the mist eliminator panels and slurry spray nozzles in all 4 FGD absorbers modules.
January 2020	S, A	1/25/2020 10:30	1/26/2020 15:00	1/25/2020 10:30	1/26/2020 15:00	28:30		28:30	The unit was placed in Maintenance Outage status to repair a waterwall tube leak discovered while the unit was offline in Reserve Standby status. The unit was returned to Reserve Standby status at the end of the outage work.
February 2020	F			2/29/2020 18:53	3/1/2020 0:00		5:07	5:07	The unit was removed from service to repair a leak at the first stage spray water control valve.
March 2020	F			3/1/2020 0:00	3/1/2020 3:22		3:22	3:22	Continuation of the repair of the leak at the first stage spray water control valve
	S, A	3/14/2020 00:00	4/1/2020 0:00	3/14/2020 0:00	4/1/2020 0:00	432:00		432:00	Planned Outage
April 2020	S, A	4/1/2020 00:00	4/4/2020 0:00	4/1/2020 0:00	4/4/2020 8:50	72:00		80:50	Continuation of the Planned Outage
	S, A	4/21/2020 07:00	4/21/2020 15:00	4/21/2020 7:00	4/21/2020 14:30	8:00		7:30	The unit was removed from Reserve Standby status and placed in Maintenance Outage status to replace a failed coupling capacitor voltage transformer (CCVT) on the start-up power feed line. The unit was returned to Reserve Standby status at the end of the outage work.

**Case No. 2020-00250**

**Attachment for Response to PSC 1-15**

**Witness: Ronald D. Gregory**

**Page 8 of 8**



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 16)** *For the period under review, provide the monthly capacity factor*  
2 *at which each generating unit operated.*

3

4 **Response)** Please see the table and the footnotes on following pages.

5

6

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission’s Request for Information  
dated August 19, 2020**

**September 2, 2020**

1

<b>Big Rivers Electric Corporation Monthly Capacity Factor by Generating Unit</b>							
<b>Generating Unit</b>	<b>Metric<sup>a</sup></b>	<b>Nov. 2019</b>	<b>Dec. 2019</b>	<b>Jan. 2020</b>	<b>Feb. 2020</b>	<b>Mar. 2020</b>	<b>Apr. 2020</b>
Station Two Unit # 1	GCF	Retired February 1, 2019					
	NCF						
Station Two Unit # 2	GCF	Retired February 1, 2019					
	NCF						
Reid Station Unit # 1 <sup>b</sup>	GCF	0.0%	Retired in NERC GADS <sup>d</sup> on December 1, 2019				
	NCF	-2.9%					
Reid Station Unit # 2 CT	GCF	1.8%	0.2%	0.0%	0.2%	0.0%	0.5%
	NCF	1.8%	0.0%	-0.2%	0.0%	-0.2%	0.4%
Green Station Unit # 1	GCF	30.1%	29.9%	23.8%	51.7%	44.1%	0.0%
	NCF	27.7%	28.2%	22.1%	48.7%	41.5%	-0.8%
Green Station Unit # 2	GCF	36.9%	0.0%	0.0%	0.0%	0.0%	0.0%
	NCF	35.3%	-1.1%	-1.1%	-0.7%	-0.7%	-0.9%
Wilson Station Unit # 1	GCF	90.6%	60.8%	64.4%	74.7%	10.6%	37.2%
	NCF	90.8%	60.3%	63.9%	74.6%	9.6%	36.2%
Coleman Station Unit # 1 <sup>c</sup>	GCF	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	NCF	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%
Coleman Station Unit # 2 <sup>c</sup>	GCF	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	NCF	-0.1%	-0.2%	-0.1%	-0.1%	-0.1%	-0.1%
Coleman Station Unit # 3 <sup>c</sup>	GCF	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	NCF	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%

2

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1

**Footnotes to Big Rivers Monthly Capacity Factor table on prior page:**

**a.-**        NCF (Net Capacity Factor) = 
$$\frac{\text{Net Actual Generation} \times 100\%}{\text{PH (Period Hours)} \times \text{NMC (Net Maximum Capacity)}}$$

              GCF (Gross Capacity Factor) = 
$$\frac{\text{Gross Actual Generation} \times 100\%}{\text{PH (Period Hours)} \times \text{GMC (Gross Maximum Capacity)}}$$

**b.-**        Reid 1 was put in Idled Status effective April 1, 2016.

**c.-**        Coleman Station Units 1 and 2 were placed in Idled Status on May 1, 2014; Coleman Station Unit 3 was placed in Idled Status on May 8, 2014.

**d.-**        NERC GADS = North American Electric Reliability Corporation Generating Availability Data System

2

3

4 **Witness)**    Jason C. Burden

5

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 17)**

2       **a. For the period under review, explain whether BREC made any**  
3           **changes to its maintenance and operation practices or completed**  
4           **any specific generation efficiency improvements that affect fuel**  
5           **usage at BREC's generation facilities.**

6       **b. Describe the impact of these changes on BREC's fuel usage.**

7

8 **Response)**

9       a. In the period under review, November 1, 2019, through April 30, 2020, Big  
10       Rivers has not made any changes to its maintenance and operation  
11       practices, or completed any specific generation efficiency improvements  
12       that affect fuel usage at Big Rivers' generation facilities.

13       b. Not Applicable.

14

15

16 **Witnesses)** Ronald D. Gregory (*a. only*) and

17           Jason C. Burden (*b. only*)

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 18)** *State whether BREC is aware of any violations of its policies and*  
2 *procedures regarding fuel procurement that occurred prior to or during the*  
3 *period under review.*

4

5 **Response)** Big Rivers is unaware of any violations of its policies and procedures  
6 regarding fuel procurement that occurred during the period November 1, 2019,  
7 through April 30, 2020. Big Rivers is also unaware of any unreported violation prior  
8 to the current period under review.

9

10

11 **Witness)** Mark W. McAdams

12

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 19)** *State whether BREC is aware of any violations of 807 KAR 5:056*

2 *that occurred prior to or during the period under review.*

3

4 **Response)** Big Rivers is unaware of any violations of 807 KAR 5:056 that occurred

5 prior to or during the period under review.

6

7

8 **Witness)** Jennifer M. Stone

9

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 20)** *State whether all fuel contracts related to commodity and*  
2 *transportation have been filed with the Commission. If any contracts have*  
3 *not been filed, explain why they have not been filed, and provide a copy.*

4

5 **Response)** All of Big Rivers' fuel and transportation contracts have been filed with  
6 the Commission.

7

8

9 **Witness)** Mark W. McAdams

10

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2019 THROUGH APRIL 30, 2020  
CASE NO. 2020-00250**

**Response to Commission's Request for Information  
dated August 19, 2020**

**September 2, 2020**

1 **Item 21)** *Refer to 807 KAR 5:056 3(5), which states, "For any contracts*  
2 *entered into on or after December 1, 2019, the commission shall, in*  
3 *determining the reasonableness of fuel costs in procurement contracts and*  
4 *fuel procurement practices, evaluate the reasonableness of fuel costs in*  
5 *contracts and competing bids based on the cost of the fuel less any coal*  
6 *severance tax imposed by any jurisdiction."*

7 *a. Provide a listing of any new coal contracts entered into on or since*  
8 *December 1, 2019.*

9 *b. For each bid solicitation or potential spot purchase that resulted in*  
10 *a new purchase contract on or after December 1, 2019, provide the*  
11 *bid evaluation sheets that include the coal severance tax rate per*  
12 *ton or MMBTU, as appropriate, being levied.*

13

14 **Response)**

15 a. No new coal contracts have been entered on or after December 1, 2019.

16 b. Not applicable.

17

18 **Witness)** Mark W. McAdams