

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2020 INTEGRATED RESOURCE ) Case No.  
PLAN OF BIG RIVERS ELECTRIC CORPORATION ) 2020-00299

**ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS**

The intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, hereby submits the following Supplemental Data Requests to Big Rivers Electric Corporation [hereinafter "BREC" or "the Company"] to be answered by the date specified in the Commission's Orders of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for BREC with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or

otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

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

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or

transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,  
DANIEL CAMERON  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Pursuant to the Commission's Orders dated March 16, 2020 and March 24, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record. Further, the Attorney General will submit the paper originals of the foregoing to the Commission within 30 days after the Governor lifts the current state of emergency.

This 20<sup>th</sup> day of April, 2021



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Assistant Attorney General

Electronic 2020 Integrated Resource Plan  
of Big Rivers Electric Corporation  
Case No. 2020-00299  
Attorney General's Supplemental Data Requests

1. Reference BREC's Attachment to AG 1-1 (a). Explain how a resource mix with 20% solar allows for BREC to meet its capacity demands.
2. Reference BREC's response to AG 1-25. Explain whether BREC believes there is a level of penetration into BREC's generation mix for solar that BREC considers safe and which will not adversely impact reliability.
3. Reference the response to PSC DR 1-4, which cited to page 144 of the Company's 2020 IRP, which states, "At the base case inputs and the current proposed PPA costs, the model would continue to add solar until reserve margins were met." The response also cautioned that: (i) "A portfolio with 100% solar generation would expose Big Rivers Member/Owners to significant market risk for capacity and energy;" (ii) extreme events such as the February 2021 Polar Vortex would exacerbate those risks; and (iii) overreliance on intermittent resources has been identified as a factor in the 2020 California brownouts, and February 2021 price volatility and brownouts in ERCOT.
  - a. Explain at what point the reserve requirements would be met.
  - b. Does BREC have a maximum amount of solar generation that it plans to have in its generation mix?
4. Explain how BREC intends to ensure a consistent and constant supply of natural gas to operate its gas-fired power plants. Include in your response whether BREC intends to at least investigate the pricing of firm gas delivery contracts.
5. Reference BREC's response to AG 1-16. Does BREC believe that at some future point it could become involved in SEEM? Explain.
6. On a mid-term to long-term basis, does BREC intend to pursue additional off-system sales through PPAs, such as the contracts with the Nebraska municipalities?
7. Provide a discussion regarding BREC's short-term and long-term plans for upgrading existing transmission facilities, and/or for constructing new ones.
  - a. Provide an update on the MISO Duff-Coleman project. If this project has been completed, explain its usefulness to BREC and whether that usefulness has matched initial expectations / projections.

Electronic 2020 Integrated Resource Plan  
of Big Rivers Electric Corporation  
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Attorney General's Initial Data Requests

8. Reference BREC's response to AG 1-26. Is BREC certain that solar power prices will not be lower in 5 years than the price BREC is paying under its 20-year contract? Same question for solar power prices in 10 years, and in 15 years.