

ORIGINAL



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

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

**Responses to the Sierra Club's
Initial Requests for Information
dated February 26, 2021**

FILED: March 19, 2021

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION

**ELECTRONIC
2020 INTEGRATED RESOURCE PLAN OF
BIG RIVERS ELECTRIC CORPORATION
CASE NO. 2020-00299**

VERIFICATION

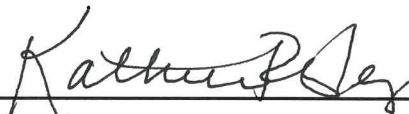
I, Nathaniel A. ("Nathan") Berry, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Nathaniel A. ("Nathan") Berry

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Nathaniel A. ("Nathan") Berry on this the 19th day of March, 2021.



Notary Public, Kentucky State at Large

Kentucky ID Number

KY NP16841

My Commission Expires

October 31, 2024

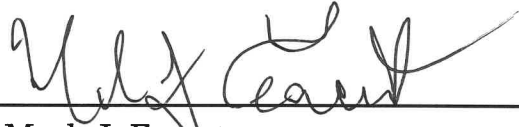


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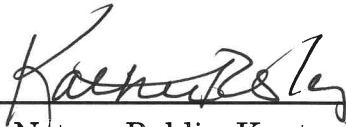
I, Mark J. Eacret, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Mark J. Eacret

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

19th SUBSCRIBED AND SWORN TO before me by Mark J. Eacret on this the
day of March, 2021.



Notary Public, Kentucky State at Large

Kentucky ID Number

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BIG RIVERS ELECTRIC CORPORATION

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VERIFICATION


I, Michael S. ("Mike") Mizell, 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.



Michael S. ("Mike") Mizell

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Michael S. ("Mike") Mizell on this the 19th day of March, 2021.



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Kentucky ID Number KYNP16841
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1 Item 1) *Refer to the IRP's references to the possibility of forming a*
2 *coalition of partners to invest in a 592 MW natural gas combined cycle*
3 *("NGCC") unit to be located at the Sebree site or the Coleman site, see IRP pp.*
4 *33,137,140.*

5 a. *Please confirm whether this plan remains a part of Big Rivers'*
6 *preferred scenario.*

7 b. *Please provide a detailed narrative update on all efforts and*
8 *progress, if any, related to forming such a coalition and planning to*
9 *invest in that unit.*

10 c. *Please identify and provide copies of all correspondence, memos,*
11 *reports, presentations, or other documents comprising or*
12 *referencing such efforts and progress, if any.*

13

14 **Response)**

15 a. Big Rivers confirms that a portion of a NGCC located at the Sebree or
16 Coleman site would be the optimal least-cost option per the analysis in Big
17 Rivers' 2020 IRP.

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- 1 b. Over the course of the summer of 2020, two or three conference calls were
2 held with entities that Big Rivers had identified as potential partners.
3 What Big Rivers found was that, for a variety of reasons, none of the parties
4 were willing to make a commitment at this time. Some had other
5 approaches to generation additions that they preferred, some preferred
6 different locations, some saw the capacity and energy markets as a better
7 option for at least the next five (5) years, and others were not at a point in
8 their resource planning process to be able to make a decision. Big Rivers
9 continues to explore the option of forming a coalition of partners to invest
10 in a 592 MW NGCC unit located at the Sebree or Coleman Site.
- 11 c. Big Rivers objects to this request as it is overly broad and seeks information
12 neither relevant nor likely to lead to the discovery of admissible evidence.
13 Any documentation of past discussions with third parties would not assist
14 the Commission's or the Sierra Club's evaluation of Big Rivers' 2020
15 Integrated Resource Plan. Big Rivers' above response to sub-part b. of this
16 request provides the relevant information, that none of the third parties
17 were willing to make a commitment. Further, the potential partners with

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1 whom Big Rivers has discussed the matter include non-parties to this
2 proceeding and even entities not under the jurisdiction of the Commission.
3 Disclosing the identities of these entities would constitute a clearly
4 unwarranted invasion of personal privacy and would disclose third-party
5 proprietary information.

6

7

8 **Witnesses)** Nathaniel A. Berry (*a. only*) and

9 Mark J. Eacret (*b. and c. only*)

10

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1 Item 2) *Refer to the IRP's references to carbon regulation, including the*
2 *Clean Power Plan ("CPP") rule and Affordable Clean Energy ("ACE") rule,*
3 *see IRP pp. 107-108, and to carbon taxes, trading, or other functional pricing,*
4 *see, e.g., id. pp. 137, 141, 169.*

5 a. *Please discuss in detail whether and how Big Rivers has amended,*
6 *or will amend, its carbon-related assumptions, forecasts, scenarios*
7 *modeled, preferred scenario, or other planning components, in*
8 *response to each of the following developments subsequent to the*
9 *2020 IRP's finalization:*

10 i. *The end of the Trump administration and the commencement*
11 *of the Biden administration, including changes (realized and*
12 *prospective) to carbon-related announced by the White House,*
13 *the U.S. Environmental Protection Agency ("EPA"), or another*
14 *agency.*

15 ii. *The D.C. Circuit's January 19, 2021, decision vacating the ACE*
16 *rule and remanding the record to EPA, see Am. Lung Ass'n v.*
17 *Envtl. Prot. Agency, 985 F.3d 914, 922 (D.C. Cir. 2021).*

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- 1 *iii. Any other development or reason that has caused Big Rivers to*
2 *amend its planning vis-à-vis carbon emissions or climate*
3 *change (if any, please identify that development/reason).*
- 4 *b. Please identify and provide copies of all correspondence, memos,*
5 *reports, presentations, or other documents comprising or*
6 *referencing the amendment of planning referenced in (a) above.*

7

8 **Response)**

- 9 a. As of this date, and given the lack of any specific legislative or rule making
10 actions by the Biden Administration addressing carbon emissions, Big
11 Rivers has made no amendments or changes to its carbon-related
12 assumptions, forecasts, scenarios modeled, preferred scenario, or other
13 planning components as outlined in its 2020 IRP. Such amendments or
14 changes will be made once specific legislative or regulatory proposals are
15 issued by the Biden Administration and the details of those specific
16 proposals can be evaluated.

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- 1 i. Other than broad general assumptions, it is not possible to determine
2 what specific impacts the end of the Trump Administration and the
3 Biden Administration's public statements about carbon policy will
4 have until such time as the EPA, or other departments within the
5 Administration, formulate draft rules addressing the topic or until
6 specific legislation designed to impact carbon emissions is proposed.
- 7 ii. As the Commonwealth of Kentucky has not yet developed its State
8 implementation plan relating to the ACE rule outlining what
9 regulatory steps would be required to comply with the rule, the vacatur
10 of the rule by the D.C. Circuit has had no impact on Big Rivers' carbon-
11 related planning, modeling or assumptions.
- 12 iii. There are none.
- 13 b. There are none. Please see Big Rivers' response to sub-part a.
- 14
- 15

16 **Witness)** Michael S. Mizell

17