

**ORIGINAL**



**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**In the Matter of:**

<b>AN ELECTRONIC EXAMINATION</b>	)	
<b>OF THE APPLICATION OF</b>	)	
<b>THE FUEL ADJUSTMENT CLAUSE</b>	)	<b>Case No.</b>
<b>OF BIG RIVERS ELECTRIC CORPORATION</b>	)	<b>2021-00058</b>
<b>FROM</b>	)	
<b>NOVEMBER 1, 2018 THROUGH OCTOBER 31, 2020</b>	)	

**Responses to the Commission Staff's  
Second Request for Information  
dated  
April 5, 2021**

**FILED: April 16, 2021**

**ORIGINAL**

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF  
THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE  
OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2018 THROUGH OCTOBER 31, 2020  
CASE NO. 2021-00058**

**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 )

16<sup>th</sup> SUBSCRIBED AND SWORN TO before me by Natalie R. Hankins on this the  
day of April, 2021.

*Katherine Ridley*

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

Kentucky ID Number

KYNPI6841

My Commission Expires

October 31, 2024



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF  
THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE  
OF BIG RIVERS ELECTRIC CORPORATION  
FROM NOVEMBER 1, 2018 THROUGH OCTOBER 31, 2020  
CASE NO. 2021-00058**

**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 )

16<sup>th</sup> SUBSCRIBED AND SWORN TO before me by Mark W. McAdams on this the  
day of April, 2021.

*Katherine Resley*

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

Kentucky ID Number

KYNP16841

My Commission Expires

October 31, 2024



**BIG RIVERS ELECTRIC CORPORATION**  
**AN ELECTRONIC EXAMINATION OF**  
**THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE**  
**OF BIG RIVERS ELECTRIC CORPORATION**  
**FROM NOVEMBER 1, 2018 THROUGH OCTOBER 31, 2020**  
**CASE NO. 2021-00058**

**Response to the Commission Staff's**  
**Second Request for Information**  
**dated April 5, 2021**

**April 16, 2021**

1 **Item 1)**     *Refer to the Direct Testimony of Mark W. McAdams (McAdams*  
2 *Testimony), page 3, lines 1–5. Explain whether BREC would continue to do*  
3 *business with owners of coal companies who have proven unreliable and had*  
4 *contracts terminated for non-performance and whether the due diligence*  
5 *process screens out these owner suppliers.*

6

7 **Response)** It would be very unlikely that Big Rivers would either initiate, or  
8 continue to do, business with a firm that has proven unreliable and/or had a prior  
9 contract terminated for non-performance

10         Big Rivers does perform due diligence on its potential and existing contractual  
11 suppliers. Despite prudent and good faith due diligence, there are events from time-  
12 to-time which occur that can result in mining interruptions or delays, or result in an  
13 inability to perform to the contractual agreement.

14         Big Rivers has and will continue its process of due diligence prior to contract  
15 award and throughout the term of the contractual agreement to, as best it can, reduce  
16 risk of supply interruption and ensure fulfillment of the coal supply agreement.

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**Response to the Commission Staff's**  
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**April 16, 2021**

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3 Witness) Mark W. McAdams

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**BIG RIVERS ELECTRIC CORPORATION**  
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**Response to the Commission Staff's**  
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**dated April 5, 2021**

**April 16, 2021**

1 **Item 2)**     *Refer to the McAdams Testimony, page 9, lines 6–19. Explain*  
2 *whether BREC experienced any reduced ability to procure pipeline capacity*  
3 *or natural gas during the recent extreme cold weather that occurred in Texas*  
4 *recently and how that event affected MISO's energy and capacity markets.*

5

6 **Response)** Big Rivers did not experience any reduced ability to procure pipeline  
7 capacity or natural gas for the Reid C.T. during the recent extreme cold weather that  
8 occurred in Texas. Big Rivers is not aware of any issues created or caused by Big  
9 Rivers' operations and/or performance during this extreme weather condition in  
10 regard to MISO's energy and capacity markets.

11

12

13 **Witness)**     Mark W. McAdams

14

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1 **Item 3)**      *Refer to Commission Staff's First Request for Information, Item*  
2 *28. Explain whether BREC's other transmission customers are served from*  
3 *its own generation units, and if so, explain why it is not appropriate to report*  
4 *that load as part of its maximum and average system demand.*

5

6 **Response)** No, Big Rivers' other transmission customers are not served from its  
7 own generating units. The "other transmission customers" in the note refers only to  
8 Henderson Municipal Power & Light ("HMP&L"). Now that HMP&L's Station Two  
9 generation station has been retired, the note about "other transmission customers"  
10 will no longer be required for review periods after HMP&L Station Two's retirement  
11 date, *i.e.*, February 1, 2019.

12

13

14 **Witness)**      Natalie R. Hankins

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