

**ORIGINAL**



**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**In the Matter of:**

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

**Responses to the Commission's Request for Information  
in Appendix B of the Commission's Order  
dated  
March 4, 2021**

**FILED: March 22, 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, 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 )

22nd SUBSCRIBED AND SWORN TO before me by Jason C. Burden on this the  
day of March, 2021.

  
\_\_\_\_\_  
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**

**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 22nd day of March, 2021.

  
\_\_\_\_\_

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**

**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 )

SUBSCRIBED AND SWORN TO before me by Natalie R. Hankins on this the 22nd day of March, 2021.

*Kathleen Pusley*

\_\_\_\_\_  
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  
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FROM NOVEMBER 1, 2018 THROUGH OCTOBER 31, 2020  
CASE NO. 2021-00058**

**VERIFICATION**

I, Roger D. Hickman, 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.



\_\_\_\_\_  
Roger D. Hickman

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

22nd SUBSCRIBED AND SWORN TO before me by Roger D. Hickman on this the  
day of March, 2021.



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

Kentucky ID Number

KYNP16841

My Commission Expires

October 31, 2024

**BIG RIVERS ELECTRIC CORPORATION**

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THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE  
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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*

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Mark W. McAdams

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

SUBSCRIBED AND SWORN TO before me by Mark W. McAdams on this the 22nd day of March, 2021.

*Katherine Polcy*

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Notary Public, Kentucky State at Large

Kentucky ID Number

KYNP16841

My Commission Expires

October 31, 2024

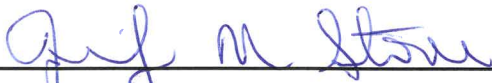


**BIG RIVERS ELECTRIC CORPORATION**

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THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE  
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FROM NOVEMEBR 1, 2018 THROUGH OCTOBER 31, 2020  
CASE NO. 2021-00058**

**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 )

22nd SUBSCRIBED AND SWORN TO before me by Jennifer M. Stone on this the  
day of March, 2021.

  
\_\_\_\_\_  
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**

**Response to the Commission’s Request for Information**  
**in Appendix B of the Commission’s Order dated March 4, 2021**

**March 22, 2021**

1 **Item 1)**     *For the period from May 1, 2020, to October 31, 2020 (the last six*  
2 *months of the period under review), provide the amount of coal purchased in*  
3 *tons and the percentage of purchases that were spot versus contract.*

4

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

6

**For the Period from May 1, 2020, through October 31, 2020**

Purchase Vendor <sup>1</sup>	Fuel Type	Purchase Tonnage	Contract Type
WKCR / ACNR (BRE-20-001A)	Coal	63,014.08	Contract
Rhino / Alliance (BRE-18-001A)	Coal	110,206.13	Contract
Alliance (BRE-18-003)	Coal	185,764.16	Contract
WKCR (BRE-19-002)	Coal	156,338.16	Contract
Rhino / Alliance (BRE-19-003A)	Coal	62,056.49	Contract
WKCR (BRE-20-001)	Coal	95,716.89	Contract
WKCR / ACNR (BRE-19-002A)	Coal	39,801.80	Contract
<b>Total Tonnage</b>		<b>712,897.71</b>	

**For the Period from May 1, 2020, through October 31, 2020**

Percentage Spot Purchase Tons	0.00 %
Percentage Contract Purchase Tons	100.00 %
Percentage Total Purchase Tons	100.00 %

7

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<sup>1</sup> WKCR = Western Kentucky Consolidated Resources, LLC; ACNR = American Consolidated Natural Resources, Inc.

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

**Response to the Commission's Request for Information**  
**in Appendix B of the Commission's Order dated March 4, 2021**

**March 22, 2021**

1

2 **Witness)** Mark W. McAdams

3

**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's Request for Information  
in Appendix B of the Commission's Order dated March 4, 2021**

**March 22, 2021**

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

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. Current price paid per ton.*

11

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

13

14

15 **Witness)**    Mark W. McAdams

16

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC / Alliance Coal, LLC**

A. CONTRACT NUMBER: BRE-18-001 / BRE-18- 001A <sup>1</sup>

B. SUPPLIER'S NAME/ADDRESS: Rhino Energy LLC/Pennyrile Energy, LLC.  
424 Lewis Hargett Circle, Suite 250  
Lexington, KY 40503  
Alliance Coal, LLC <sup>1</sup>  
1717 South Boulder, Suite 400  
Tulsa, OK 74119

C. PRODUCTION FACILITY: Pennyrile Energy LLC  
Riveredge Mine, McLean County, Kentucky  
River View Coal, LLC  
River View Mine, Union County, Kentucky

D. METHOD OF DELIVERY: Barge

E. ACTUAL TONNAGE:

	2018	-	350,000	Tons	
	2019	-	342,466	Tons	
	2020	-	207,980	Tons	<i>(through October)</i>

ANNUAL TONNAGE REQUIREMENTS:

	2018	-	350,000	Tons	
	2019	-	150,000 min. 350,000 max.	Tons	
	2020	-	150,000 min. 350,000 max.	Tons	

PERCENT OF ANNUAL REQUIREMENTS:

	2018	-	100.00 %		
	2019	-	97.85 %		<i>(through December)</i> <sup>1</sup>
	2020	-	100.21 %		<i>(through October)</i> <sup>2</sup>

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<sup>1</sup> Assigned to Alliance Coal on September 6, 2019. Referenced following assignment as Rhino/Alliance (BRE-18-001A). Calculated based on 350,000 ton maximum for 2019 per assignment. [342,466 tons *divided by* 350,000 tons = 97.85%]

<sup>2</sup> Calculated based on 200,000 nominated tons for 2020 *plus* 7,534 tons carryover from 2019 equaling 207,534 tons. [207,980 tons *divided by* 207,534 tons = 100.21%]

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC / Alliance Coal, LLC (*continued*)**  
*(Contract Numbers – BRE-18-001 / BRE-18-001A)*

F. CURRENT PRICE ( <i>Base</i> ):	2018	–	\$ 37.5002	per Ton
	2019	–	\$ 38.6302	per Ton ( <i>Jan. – Aug.</i> )
<i>Assigned Prices</i>	2019	–	\$ 36.2710	per Ton ( <i>Sept. – Dec.</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 Prices</i>	2019	–	\$ 36.2710	per Ton ( <i>Sept. – Dec.</i> )
	2020	–	\$ 37.4302	per Ton



**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**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)
ANNUAL TONNAGE REQUIREMENTS:	2018	-	80,000	Tons (Amendment One)
	2019	-	80,000	Tons <sup>3</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)
F. 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>3</sup> Big Rivers provided a quality suspension notice on August 15, 2019.

<sup>4</sup> Big Rivers provided a contract termination notice on February 13, 2020.

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**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 –	296,364	Tons (through October)
ANNUAL TONNAGE REQUIREMENTS:	2018 –	585,000	Tons (effective date – February 12, 2018)
	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 %	(through December) <sup>5</sup>
	2020 –	69.73 %	(through October) <sup>6</sup>
F. 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
	2020 –	\$ 39.0011	per Ton

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<sup>5</sup> Calculated based on 675,000 nominated tons for 2019. [676,162 tons *divided by* 675,000 tons = 100.17%]

<sup>6</sup> Calculated based on 425,000 nominated tons for 2020. [296,364 tons *divided by* 425,000 tons = 69.73%]

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /**  
**American Consolidated Natural Resources, Inc. (“ACNR”)**

A. CONTRACT NUMBER:	BRE-19-002 / BRE-19-002A <sup>7</sup>			
B. SUPPLIER’S NAME / ADDRESS:	Western Kentucky Consolidated Resources, LLC <sup>7</sup> KenAmerican Resources, Inc. American Consolidated Natural Resources, Inc. 46226 National Road St. Clairsville, OH 43950			
C. PRODUCTION FACILITY:	WKCC Genesis Mine MCCC Pride Mine KenAmerican Paradise Mine ACNR Pride Mine			
D. METHOD OF DELIVERY:	Truck and/or barge			
E. ACTUAL TONNAGE:	2019	–	456,313	Tons
	2020	–	361,343	Tons <i>(through October)</i>
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>8</sup>
	2020	–	85.02 %	<i>(through October)</i> <sup>9</sup>

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<sup>7</sup> On September 10, 2020, the WKCR Agreement was assumed by ACNR, and assigned Contract Number BRE-19-002A.

<sup>8</sup> Calculated based on 456,313 nominated tons for 2019. No Option tons nominated. [456,313 tons *divided by* 450,000 tons = 101.40%]

<sup>9</sup> Calculated based on 425,000 nominated tons for 2020. No Option tons nominated.

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /**  
**American Consolidated Natural Resources, Inc. (“ACNR”) (continued)**  
*(Contract Numbers – BRE-19-002 / BRE-19-002A)*

F. 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	–	\$ 43.45	per Ton <sup>10</sup>
	2021	–	\$ 43.45	per Ton <sup>10</sup>
OPTION PRICE ( <i>Contract</i> ):	2020	–	\$ 43.85	per Ton <sup>10</sup>
	2021	–	\$ 44.85	per Ton <sup>10</sup>

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<sup>10</sup> Price increased in 2020 and 2021 by \$0.60 per ton, governmental imposition, Black Lung tax.

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC / Alliance Coal, LLC**

A. CONTRACT NUMBER: BRE-19-003 / BRE-19-003A <sup>11</sup>

B. SUPPLIER'S NAME / ADDRESS: Rhino Energy LLC/Pennyrile Energy, LLC. <sup>11</sup>  
424 Lewis Hargett Circle, Suite 250  
Lexington, KY 40503  
  
Alliance Coal, LLC <sup>11</sup>  
1717 South Boulder, Suite 400  
Tulsa, OK 74119

C. PRODUCTION FACILITY: Pennyrile Energy LLC  
Riveredge Mine, McLean County, Kentucky  
River View Coal, LLC  
River View Mine, Union County, Kentucky

D. METHOD OF DELIVERY: Barge

E. ACTUAL TONNAGE: 2019 – 69,186 Tons (*through December*)  
2020 – 182,075 Tons (*through October*)

ANNUAL TONNAGE REQUIREMENTS:

2019 –	100,000 min. 150,000 max.	Tons
2020 –	100,000 min. 150,000 max.	Tons
2021 –	350,000 min. 500,000 max.	Tons
2022 –	200,000 min. 350,000 max.	Tons
2023 –	200,000 min. 350,000 max.	Tons

PERCENT OF ANNUAL REQUIREMENTS:

2019 –	46.12 %	( <i>through December</i> ) <sup>12</sup>
2020 –	93.85 %	( <i>through October</i> ) <sup>13</sup>

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<sup>11</sup> Assigned to Alliance Coal on September 6, 2019. Referenced following assignment as Rhino/Alliance (BRE-19-003A).

<sup>12</sup> Calculated based on 150,000 ton maximum for 2019 per assignment. [69,187 tons *divided by* 150,000 tons = 46.12%]

<sup>13</sup> Calculated based on 112,500 nominated tons for 2020 *plus* 81,499 tons carryover from 2019 equaling 193,999 tons. [182,075 tons *divided by* 193,999 tons = 93.85%]

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC / Alliance Coal, LLC (continued)**  
*(Contract Numbers – BRE-19-003 / BRE-19-003A)*

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

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /**  
**American Consolidated Natural Resources, Inc. (“ACNR”)**

A. CONTRACT NUMBER: BRE-20-001 / BRE-20-001A <sup>14</sup>

B. SUPPLIER’S NAME / ADDRESS: Western Kentucky Consolidated Resources, LLC <sup>14</sup>  
Muhlenberg County Coal Company, LLC  
American Consolidated Natural Resources, Inc.  
46226 National Road  
St. Clairsville, OH 43950

C. PRODUCTION FACILITY: WKCC Genesis Mine  
MCCC Pride Mine  
ACNR Pride Mine

D. METHOD OF DELIVERY: Truck and/or barge

E. ACTUAL TONNAGE: 2020 – 278,118 Tons *(through October)*

ANNUAL TONNAGE REQUIREMENTS:

2020	–	300,000 min.	Tons	
		400,000 max.		
2020	–	0 min.	Tons	<sup>15</sup>
<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.		

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<sup>14</sup> On September 10, 2020, this contract was assumed by ACNR and assigned Contract Number BRE-20-001A.

<sup>15</sup> No option tons nominated.

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /**  
**American Consolidated Natural Resources, Inc. (“ACNR”) (continued)**  
*(Contract Numbers – BRE-20-001 / BRE-20-001A)*

PERCENT OF ANNUAL REQUIREMENTS:	2020 –	85.57 %	<i>(through October)</i> <sup>16</sup>
F. 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 –	\$ 43.35	per Ton ( <i>Jan. – May</i> ) <sup>17</sup>
	2020 –	\$ 43.25	per Ton ( <i>June – Dec.</i> ) <sup>17</sup>
	2021 –	\$ 43.85	per Ton <sup>17</sup>
	2022 –	\$ 43.70	per Ton
	2023 –	\$ 44.15	per Ton
OPTION PRICE ( <i>Contract</i> ):	2020 –	\$ 44.00	per Ton ( <i>Jan. – May</i> ) <sup>17</sup>
	2020 –	\$ 43.90	per Ton ( <i>June – Dec.</i> ) <sup>17</sup>
	2021 –	\$ 44.50	per Ton <sup>17</sup>
	2022 –	\$ 44.35	per Ton
	2023 –	\$ 44.80	per Ton

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<sup>16</sup> Calculated based on 325,000 nominated tons for 2020. No Option tons nominated. [ 278,118 tons *divided by* 325,000 tons = 85.57%]

<sup>17</sup> Price increased by \$0.60 per ton for governmental imposition, Black Lung tax.



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF  
THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE  
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in Appendix B of the Commission's Order dated March 4, 2021**

**March 22, 2021**

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 October 31, 2020, Big Rivers' generating stations individually and in  
17      the aggregate had the following inventory levels and days' supply.

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<b>Total System / Station <sup>6</sup></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>	536,676.49	72	135	1,009,905.96
<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>	182,679.81	55	115	379,277.04
<b>Coleman Station <sup>5</sup></b>	0.00	0	0	0.00
<b>Wilson Station</b>	288,532.08	80	176	630,628.92

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

<b>Big Rivers Electric Corporation Coal Inventory Target Ranges</b>	
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

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- 1 d. Inventory is above target levels, exceeding ten (10) days excess, as a result  
2 of reduced electricity demand during the last six months of the review  
3 period, *i.e.*, May 1, 2020, through October 31, 2020, and as a result of the  
4 COVID-19 pandemic. Big Rivers' coal inventory level is falling based upon  
5 the resumption of business activity that had slowed due to COVID-19, along  
6 with Big Rivers' efforts toward contract management. Big Rivers,  
7 minimized several contract options in regard to existing coal supply, and  
8 further, did not procure any spot coal during the last six months of the  
9 review period in an effort to reduce its current inventories.
- 10 e.
- 11 (1) No.
- 12 (2) Not Applicable.
- 13
- 14

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1

**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. Petroleum coke has not been purchased due to market pricing versus coal.
- 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 retired Reid Station Unit 1 effective September 30, 2020.
- 4.- Station Two Units 1 and 2 were retired on February 1, 2019. The duration of generation was reduced to zero days. Big Rivers has relocated all coal inventory to its Green Station effective February 2021.
- 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 retired Coleman Station effective September 30, 2020.
- 6.- In all reviews subsequent to Case No. 2021-00058, Big Rivers will remove notations for the Coleman Station, Reid Station, and Henderson Station Two and remove them from Big Rivers' inventory calculations.

2

3

4 **Witness)** Mark W. McAdams

5

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

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

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

15

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1 **Response)**

2       a. and b.

3           There were no written coal-supply solicitations issued during the last six  
4           months of the period under review, *i.e.*, May 1, 2020, through October 31,  
5           2020.

6

7

8 **Witness)**   Mark W. McAdams

9

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

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

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

13

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1 **Response)**

2 a. and b.

3 There were no oral coal-supply solicitations issued during the last six  
4 months of the period under review, *i.e.*, May 1, 2020, through October 31,  
5 2020.

6

7

8 **Witness)** Mark W. McAdams

9



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1 **Item 6)**     *For the last six months of the period under review, list each*  
2 *vendor from whom natural gas was purchased for generation and the*  
3 *quantities and the nature of each purchase (i.e., spot or contract). Provide*  
4 *the percentage of purchases that were spot versus contract.*

5

6 **Response)** Please see the listing on the following page for vendors from whom  
7 natural gas was purchased for generation and the quantity and nature of each  
8 purchase from May 1, 2020, through October 31, 2020. Also on the following page  
9 please see the percentage of purchases that were either spot versus contract for the  
10 period under review in total.

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

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1 Big Rivers' Reid CT is called upon by MISO (the Midcontinent Independent  
2 System Operator, Inc.) from time-to-time for reliability and for generation purposes.  
3 Inasmuch, the Reid CT natural gas supply is on a spot basis for its generation fuel.

4

**For the Period from May 1, 2020, through October 31, 2020**

<b>Purchase Vendor</b>	<b>Fuel Type</b>	<b>MCF</b>	<b>Contract Type</b>
CIMA Energy, LTD	Natural Gas	31,301.00	Spot

**For the Period from May 1, 2020, through October 31, 2020**

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

5

6

7 **Witness)** Mark W. McAdams

8

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

5

6 **Response)** There were no instances during the last six months of the period under  
7 review, *i.e.*, May 1, 2020, through October 31, 2020, that Big Rivers' gas generating  
8 unit could not be operated, when it otherwise would have run, due to pipeline  
9 constraints or natural gas being unavailable.

10

11

12 **Witness)**     Mark W. McAdams

13

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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

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1 **Item 9)**

2 *a. State whether BREC has audited any of its fuel or transportation*  
3 *contracts during the last six months of 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*  
8 *BREC took as a result of the audit.*

9

10 **Response)**

11 a. Big Rivers has audited two of its coal supply source mine operations  
12 (ACNR/Pride Mine September 2, 2020; and River View Mine, September  
13 17, 2020) and associated sampling systems (Alliance River View sampling  
14 system October 7, 2020; and ACNR/Pride sampling system October 14,  
15 2020) during the period during the last six months of the period under  
16 review, *i.e.*, May 1, 2020, through October 31, 2020. Big Rivers has not  
17 audited any of its transportation contracts during that same period.

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1       b.

- 2           (1)   WKCR/ACNR contracts BRE-19-002 and BRE-20-001 (source Pride  
3           Mine); and Rhino/Alliance and Alliance contracts BRE-18-001, BRE-  
4           18-003, and BRE-19-003 (source River View Mine).
- 5           (2)   Mine reviews were performed by Associated Engineers,  
6           Madisonville, Kentucky and sampling system reviews by SGS  
7           Laboratories, Henderson, Kentucky.
- 8           (3)   Big Rivers requested a mine engineering review of the WKCR/ACNR  
9           Pride Mine and the Alliance River View mining operations to ensure  
10          that both mines had the ability to continue to perform pursuant to  
11          the coal supply agreements in regard to quality and quantity  
12          obligations of each agreement. Associated Engineers reviewed both  
13          company's mining operations and provided a positive review of the  
14          mining firm's abilities to perform under the coal supply agreements.  
15          SGS Laboratories performed a review of the sampling systems to  
16          ensure that the systems were performing properly per design to

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1                   provide an appropriate and representative sample for determination  
2                   of coal quality.

3                   (4)   SGS Laboratories reviewed the sampling systems, finding the systems  
4                   in good order and appropriate for obtaining samples.

5

6

7 **Witness)**   Mark W. McAdams

8

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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 BREC;***

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



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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

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1 **Item 11)**

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

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1 **Response)**

2 a. Yes, during the last six months of the period under review, *i.e.*, May 1, 2020,  
3 through October 31, 2020, Big Rivers made changes to Policy No. 105 –  
4 Energy–Related Transaction Authority Policy, Policy No. 111 – Hedge Policy,  
5 and Policy No. 120 – Fuel Procurement Policies and Procedures.

6 b. (1) through (4)

7 Policy No. 105 – Energy–Related Transaction Authority Policy

8 On August 21, 2020, Big Rivers made punctuation changes on page  
9 11 of 21, and on page 19 of 21.

10

11 Policy No. 111 – Hedge Policy

12 On August 21, 2020, Big Rivers modified the ranges for the hedging  
13 percentages in the table on page 2 of 4 of this policy, and made a minor  
14 punctuation change on that same page. The hedging percentages were  
15 modified to provide Big Rivers greater flexibility to manage inventory levels  
16 and/or future spot coal procurement opportunities.

17

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1           Policy No. 120 – Fuel Procurement Policies and Procedures

2                       On August 21, 2020, Big Rivers replaced the term ‘VP Production  
3           with ‘Executive Vice President of Operations’ and made a minor  
4           punctuation change on page 3 of 9.

5

6                       Copies of these three policies are attached to this response along with  
7           redlines thereof showing the changes from the prior versions of these  
8           policies.

9           c.   Big Rivers’ other fuel procurement policies and procedures were not  
10           changed during the last six months of the period under review, *i.e.*, May 1,  
11           2020, through October 31, 2020. In the table on the following page, Big  
12           Rivers lists these other written policies and procedures regarding fuel  
13           procurement, the date of their last changes, and the proceedings in which  
14           Big Rivers provided them to the Commission.

15

16

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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>
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>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

### **1. Policy Purpose**

The purpose of this policy is to define the authority granted by the Big Rivers Electric Corporation (“Big Rivers”) Board of Directors (“Board”) to the President & Chief Executive Officer (“CEO”) to execute, or to delegate authority to execute energy-related transactions. Furthermore, it sets forth clarity and empowerment among those with transaction authority and is designed to encourage communication among individuals with transaction authority and the Board.

### **2. Objective**

The objective of Big Rivers’ Energy Related Transaction Authority Policy is to define:

- Who has authority to execute transactions,
- The commodities and products that can be transacted,
- The authorized lead-time and term for each transaction,
- The authorized maximum price and volume,
- Counterparty contract and credit requirements,
- The process for approving new commodities, products or locations,
- Big Rivers’ intention regarding hedging and speculating,
- Other relevant factors associated with due diligence in authorizing transactions to be executed.

### **3. Procedural Requirements**

The following defines the procedural requirements that apply to all commodities and products transacted pursuant to this policy.

#### **Execution Authority**

Execution Authority is outlined by commodity in the authority matrix sections found below. All column limits in these matrices are applied independently of one another for each authority level, in that no individual column limit may be exceeded without authorization, regardless of whether a transaction does not exceed another column limit for that same authority level. Limits for each level of authority are cumulative, and include all column limits up to and including that level. The authority granted in this policy should not violate any other policy limits.

The transaction limits apply to both purchases and sales.

This policy identifies Board-authorized levels for the CEO and explicitly gives the CEO the authority to delegate authority levels to Big Rivers’ staff and ACES Power Marketing (“ACES”). The CEO has the authority to modify delegated authority levels (noted in Appendix A) at his sole discretion as long as the delegated authority does not exceed his own authority per this policy.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**Contract Requirements**

Transactions with counterparties shall only be permitted if Big Rivers has either:

- An active, valid, and executed agreement enabling such transaction activity with that counterparty,
- Long-form confirmations may be used as a valid agreement in lieu of a permanent agreement, when necessary if approved in writing by the Big Rivers CEO.

**Credit Requirements**

Credit limits for each counterparty shall not be intentionally exceeded. *(Note: Since credit exposures are a function of not only positions transacted, but also a function of market pricing and volatility, credit exposure to counterparty may unintentionally exceed a credit limit purely due to changes in the forward market.)*

Entering into unsecured transactions with a counterparty that has total credit exposure greater than or equal to its open line of credit and the total of any security currently provided will not be allowed unless approved in writing by the Big Rivers CEO.

**Credit Slewing**

All slewing transactions for credit purposes shall be approved by the CEO. *(Note: Slewing is an arrangement where a more financially reputable entity acts as middleman for a smaller, undercapitalized entity in the purchase or sale of power.)*

**Contract Slewing**

This policy does not prohibit Big Rivers from being positioned between another member or customer of ACES and an external counterparty in order to bridge a contract gap that exists. The sleeve must:

- Be only for physical power, transmission or natural gas, not transportation,
- Be only for terms of one month or less.

Contract slewing on behalf of Big Rivers is approved when it is either the only or the most economical path to pursue at the discretion of ACES, with prompt after-the-fact notice to the Big Rivers CEO.

**Transaction Communications**

All communications for bilateral electric power transactions must be transacted via a recorded communication method. Examples include, but are not limited to, voice recorded communication, instant messaging, email or via an online broker account. Recorded communications must be maintained and controlled by personnel who are independent of the transaction function.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**Deal Capture**

Power transactions executed by a Big Rivers employee must be promptly forwarded to ACES after the deal execution.

**Speculation**

Speculation refers to a purchase or sale transaction in which the intent was to realize a profit without an underlying long or short generation position. No speculative transaction activities shall be permitted, and no speculative transaction positions shall be initiated. Transactions will be permitted only for purposes of hedging and portfolio optimization.

**Non-Standard Products**

The Board must pre-approve any transaction that involves commodities or products not listed in this policy.

**Transactions Requiring Board Approval**

Transactions which meet any of the following criteria must be pre-approved by the Board prior to execution:

- The transaction is a new commodity or within the list of commodities not previously transacted by Big Rivers,
- The transaction is at a location in which no transactions are permitted,
- The transaction is for something other than: physical spot or forward electricity, natural gas, fuel oil, solid fuel, ancillary services, capacity, power transmission, financial transmission rights, gas transportation, gas imbalance and storage, solid fuel transportation, exchange transacted energy products, over-the-counter (OTC) financial energy transactions, OTC energy options, federal SO<sub>2</sub> or NO<sub>x</sub> emission allowances, renewable energy credits or a unit outage insurance product.

Examples of new instruments would include the use of derivatives with different risk characteristics or the use of derivatives to implement different business strategies or goals. New instruments or locations would also include those instruments or locations that may be transacted on a “one-off” basis, which would be implementation of a derivative instrument or entry into a commodity market that, despite the anticipation of being transacted just once, would still fit the definition of a new instrument or location.

The purpose of defining a process for such transactions as noted above is to ensure that the exposures associated with them are thoroughly reviewed and understood by the Board and appropriate transaction controls are in place. The Board must approve the use of such transactions prior to execution using the process defined below:



<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

- a) Transaction Proposal - The proposal is the responsibility of the person or business group proposing the transaction. The proposal should address the business need, risks, transaction controls, valuation methodology, accounting methodology, operations workflow/ methodology, and assessment of legal and regulatory issues.
  
- b) Board Review - The Board will perform a review of the benefits and risks of the proposed transaction. The Board will assess the proposed transaction and make a determination whether to add the proposed transaction to the approved list.
  
- c) Approval (Pilot Program) – The Board may approve limited use of the proposed transaction to ensure that proper controls are in place to monitor the activity. The Board may approve the proposed transaction without instituting a Pilot Program if the proposed transaction is going to be used once (one off), where it would not be prudent to test it in a shorter time frame or smaller quantity due to constraints such as liquidity or length of term of product. The Board will use more scrutiny in approval of one-off transactions.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

#### **4. Bilateral Energy, Capacity and Transmission Purchases and Sales Transaction Authority**

The following outlines transaction limits, definitions, and procedural requirements for energy, capacity and transmission transactions.

<b>Purchases</b>		<b>Per Transaction Limits (up to)</b>				<b>Aggregate Limits (up to)</b>	
<b>Title</b>	<b>Product</b>	<b>Term</b>	<b>Lead Time</b>	<b>MW Size</b>	<b>Max. \$/MWH</b>	<b>Total Volume MWH</b>	<b>Total \$</b>
Board	Energy, Capacity and Transmission	No Limit	No Limit	No Limit	No Limit	No Limit	No Limit
CEO	Energy	≤ 2 Years	≤ 3 Years	≤ 400	≤ \$150	7,008,000	\$350.4 million
	Capacity	≤ 3 Years	≤ 3 Years	≤ 100	≤ \$8	1,752,000	\$14.016 million
	Transmission	≤ 2 Years	≤ 3 Years	≤ 100	Tariff	1,752,000	Tariff

<b>Sales</b>		<b>Per Transaction Limits (up to)</b>				<b>Aggregate Limits (up to)</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>
Board	Energy, Capacity and Transmission	No Limit	No Limit	No Limit	No Limit	No Limit	No Limit
CEO	Energy	≤ 2 Years	≤ 3 Years	≤ 400	No Limit	11,100,000	No Limit
	Capacity	≤ 2 Years	≤ 3 Years	≤ 500	No Limit	13,140,000	No Limit
	Transmission	≤ 2 Years	≤ 3 Years	≤ 100*	No Limit	2,628,000	No Limit

\*Lesser of 100 MW or rights to transmission capacity owned by Big Rivers.

#### **Energy, Capacity and Transmission Authority Matrix Explanations**

- Transaction limits represent the MW volume per hour and dollars/MWH for each transaction executed.
- Aggregate Limits represent the sum total MWH volume and dollars for all physical and financial forward transactions, excluding options.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
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- Lead time represents the time period from the date the transaction is executed to the start of the transaction.
- Authorized products include energy both forwards and options, transmission and capacity, including both physical and financial derivatives. Options may only be entered into by the Big Rivers CEO or his designee.
- Authority for PJM and MISO products is defined in the authority matrices below.

### **Delivery Locations**

Transactions at delivery locations outside the eastern interconnect are not permitted, unless approved by the CEO. Transaction at delivery locations that are normal to the daily course of business for Big Rivers, to the extent transmission is available, are authorized as follows:

#### **Unrestricted Delivery Locations**

- SERC Reliability Region
- MISO
- PJM
- RFC Reliability Region
- SPP

Transaction at any other delivery locations within the eastern interconnection shall be restricted as follows:

#### **Restricted Delivery Locations**

Other eastern interconnection locations only with approval by the Big Rivers CEO.

### **Firmness of Energy**

The product firmness of all transactions must be provided for in an executed agreement between Big Rivers and the appropriate counterparty. Sales commitments must never be more firm than the supply source, including the purchase side of back-to-back sales, swaps, sleeves or spreads unless the Big Rivers CEO gives explicit written authority to sell power that is more firm than the supply source. Energy purchased as firm liquidated damages may be resold as such.

### **Transmission Firmness and Volume**

Transmission purchases need to be of equal firmness and volume to the energy component that such transmission purchase is associated with, unless pre-approved otherwise by the Big Rivers CEO. (Note: Purchasing small percentages of additional transmission to cover transmission losses is permitted.) In addition, transmission may be reserved but not utilized if an energy schedule is not confirmed prior to scheduling deadlines outside of Big Rivers' or ACES's control. When this occurs it is not considered a violation of this policy.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**5. MISO Transaction Authority**

The following outlines transaction limits, definitions, and procedural requirements 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>
Board	All MISO Products	No Limit	No Limit	No Max	No Max
CEO	Generation Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 3 Years	≤ 3 Years	500	
	Financial Transmission Rights	≤ 4 Years	≤ 4 Years	425	\$20
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	No Max	MISO Price Cap

**MISO Authority Matrix Explanations**

- Virtual transaction award limits are per each bid/offer nodal point. Virtual purchase awards and virtual sales awards are monitored separately.
- Imports and exports are per location and are monitored separately.
- Generation Award Limits are per generating unit.
- Demand Award Limits are per each load nodal point.
- Limits for Ancillary Service Awards apply to the Regulation and Operating (Spinning and Supplemental) Reserve Market only.
- Capacity limits apply to capacity transacted via the MISO Capacity Auction for each generating unit and excludes the capacity required for Big Rivers' native load.
- Only Financial Transmission Rights that are bought and sold via the annual and monthly auctions or in the secondary market are monitored per the limits above. Participation in the Annual Allocation of financial transmission rights is not considered a transaction subject to this Policy.
- Delivery lead time represents the time period between trade execution and start of flow.

Note that all MISO day-ahead transactions, such as price-sensitive offers and bids for importing and exporting from MISO, are financially firm. Hence an exception from the firmness of power for adjustments to these day ahead transactions intraday is acceptable due to the fact that these adjustments are hourly and non-firm.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

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

The following outlines transaction limits, definitions, and procedural requirements 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>
Board	All PJM Products	No Limit	No Limit	No Max	No Max
CEO	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 4 Years	≤ 4 Years	425	\$20
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	No Max	PJM Price Cap	

**PJM Authority Matrix Explanations**

- Virtual transaction award limits are per each bid/offer nodal point. Incremental purchase awards and decremental sales awards are monitored separately.
- Imports and exports are per location and are each monitored separately.
- Only financial transmission rights that are bought and sold via the annual and monthly auctions or in the secondary market are monitored per the limits above. Participation in the Annual Allocation of financial transmission rights is not considered a transaction subject to this Policy.

Note that PJM RTO day-ahead transactions, such as price-sensitive offers and bids for importing and exporting from PJM are financially firm. Hence an exception from the firmness of power for adjustments to these day ahead transactions intraday is acceptable due to the fact that these adjustments are hourly and non-firm.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

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

The following outlines transaction limits, definitions, and procedural requirements for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical Volume per Day MMBtu	\$/ MMBtu	Total Physical Volume MMBtu	Total \$
Board	Gas Products	No Limit	No Limit	No Max.	No Max.	No Max.	No Max.
CEO	Physical	> 1 Year ≤ 2 Years	≤ 2 Years	25,000	\$15	1.2 million	\$18 million
		≤ 1 Year		No Max.	No Max.		

**Gas Authority Matrix Explanations**

- Transaction limits represent the physical MMBtu volume per day and dollars/MMBtu for each transaction executed.
- Aggregate limits represent the total physical MMBtu volume and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.
- The dollar limits are based upon commodity gas only and do not include transportation, however, the term, lead time, and volume limits do apply to transportation.
- Gas products include physical gas, as well as transportation, imbalance and storage. The above authority matrix applies to both exchange transacted and OTC derivative products.

**Gas Firmness**

The product firmness of all transactions must be provided for in an executed agreement between Big Rivers and the appropriate counterparty. Sales commitments of Gas must never be more firm than the Gas supply source unless pre-approved by the Big Rivers CEO.

**Transportation Firmness and Volume**

Transportation purchases need to be of equal firmness and volume to the Gas component that such transportation purchase is associated with, unless pre-approved otherwise by the Big Rivers CEO.

<b>Energy Related Transaction Authority Policy</b>				
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**Delivery Locations**

Gas transactions may only be executed at the following locations:

- Pipelines and hubs that serve Big Rivers' gas powered generation unit(s).

Physical Gas transactions may only be executed at other locations upon approval of the Big Rivers CEO and such transactions must support the hedging needs of Big Rivers.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**8. 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 \$
Board of Directors	Renewable Energy Credits	No Limit	No Limit	No Max.	No Max.	No Max.	No Max.
CEO	Renewable Energy Credits	≤ 3 Years	≤ 4 Years	400,000	\$15	800,000	\$12 Million

**Renewable Energy Credits Trading Authority Matrix Explanations**

- The authority matrix above addresses authority for Renewable Energy Credits (RECs).
- 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 RECs. Lead time limits only apply to forward transactions and not to spot transactions.



<b>Energy Related Transaction Authority Policy</b>				
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**9. Fuel Oil Transaction Authority**

The following outlines transaction limits, definitions, and procedural requirements for physical fuel oil transactions.

Fuel oil hedging will be conducted to hedge price risk associated with fuel oil used for plant start-up or to hedge potential fuel oil or diesel fuel price risk contained within solid fuel contracts.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical - Volume Gallons	\$/Gallon	Total Physical - Volume Gallons	Total \$
Board	Physical Fuel Oil	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Fuel Oil	> 1 Year	≤ 2 Years	1,000,000	\$6	6,000,000	\$36 million
		≤ 3 Years		No Max	No Max		
		≤ 1 Year					

**Fuel Oil Authority Matrix Explanations**

- Transaction limits represent the total gallons and dollars/gallon for each transaction executed.
- Aggregate limits represent the sum total gallon volume and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

<b>Energy Related Transaction Authority Policy</b>				
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Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**10. Solid Fuel Transaction Authority**

The following outlines transaction limits, definitions, and procedural requirements for solid fuel transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
Board	Physical Solid Fuel	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Solid Fuel	> 3 Months ≤ 3 Years	≤ 2 Years	2,500,000	\$2.50	4 million	\$240 million
		≤ 3 Months		200,000	\$2.85		

**Solid Fuel Authority Matrix Explanations**

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars/MMBtu for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**11. Transportation Transaction Authority**

The following outlines transaction limits, definitions, and procedural requirements for transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board	Barge, Rail or Truck Transportation	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Barge, Rail or Truck Transportation	> 1 Year ≤ 3 Years	≤ 2 Years	3 million	\$25	6 million	\$150 million
		≤ 1 Year		No Max	No Max		

**Transportation Authority Matrix Explanations**

- Authorized products include barge, rail and truck transportation transactions.
- Per transaction limits represent the total quantity in tons and dollars/ton for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

<b>Energy Related Transaction Authority Policy</b>				
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Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**12. Emission Allowances Transaction Authority\***

The following outlines transaction limits, definitions, and procedural requirements for emissions transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board	Federal SO <sub>2</sub> and NO <sub>x</sub> Emission Allowances	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Federal SO <sub>2</sub> Emission Allowances	> 1 Year ≤ 2 Years	≤ 2 Years	5,000	\$500	20,000	\$10 million
		≤ 1 Year		No Max	No Max		
	Federal NO <sub>x</sub> Emission Allowances	> 1 Year ≤ 2 Years		2,500	\$2,500	12,500	\$30 million
		≤ 1 Year		No Max	No Max		

**Emission Allowance Authority Matrix Explanations**

- The authority matrix above represents authority for SO<sub>2</sub> and NO<sub>x</sub> emission allowances.
- Per transaction limits represent the total quantity in tons and dollars/ton for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

<b>Energy Related Transaction Authority Policy</b>				
Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**13. Limestone Reagent Transaction Authority**

The following outlines transaction limits, definitions, and procedural requirements 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 \$
Board	Physical Limestone Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Limestone Reagent	> 3 Months ≤ 3 Years	≤ 2 Years	750,000	\$20	1.50 million	\$30 million
		≤ 3 Months		No Max	No Max		

**Limestone Reagent Authority Matrix Explanations**

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

<b>Energy Related Transaction Authority Policy</b>				
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Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

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

The following outlines transaction limits, definitions, and procedural requirements 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 \$
Board	Physical Lime Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Lime Reagent	> 3 Months ≤ 3 Years	≤ 2 Years	750,000	\$200	750,000	\$150 million
		≤ 3 Months		No Max	No Max		

**Bulk Lime and Lime Hydrate Reagent Authority Matrix Explanations**

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

<b>Energy Related Transaction Authority Policy</b>				
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Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**15. MATS Reagent Transaction Authority**

The following outlines transaction limits, definitions, and procedural requirements 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 \$
Board	MATS Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	MATS Reagent	> 3 Months ≤ 3 Years	≤ 2 Years	25,000	\$4,000	25,000	\$100 million
		≤ 3 Months		No Max	No Max		

**MATS Reagent Authority Matrix Explanations**

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.

<b>Energy Related Transaction Authority Policy</b>				
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Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**16. Acknowledgements**

**Clear Authority and Staff and ACES Authority Delegations**

Where authority is further downward delegated, it must be approved by written signature of the next authority level up prior to any execution. In no case will the delegation of authority to Big Rivers' staff or ACES exceed that of the Big Rivers CEO.

**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 their immediate supervisor and to the Director Strategic Planning and Risk Management 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).

**Policy Effective**

This Transaction Authority Policy is in effect upon the Board's approval and shall remain in effect until a revised policy has been approved by the Board.

**Responsibility**

It shall be the responsibility of the Board, the CEO, the Big Rivers-IRMC and the ACES-IRMC to ensure compliance with this policy.



<b>Energy Related Transaction Authority Policy</b>				
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Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

<b>Number</b>	<b>Date</b>	<b>Notes</b>	<b>Approved by</b>
		Replaced Risk Management Policy for Power Supply	Board
<b>Original</b>	06/15/2007	Trading Authority Policy w/o matrices	Board
<b>Rev 1</b>	10/16/2009	Name change to Energy Related Transaction Authority Policy with matrices	Board
<b>Rev 2</b>	11/19/2010	MISO Transaction Authority added	Board
<b>Rev 3</b>	12/17/2010	Updated Solid Fuel Transaction Authority	Board
<b>Rev 4</b>	03/18/2011	Added limestone and lime, general cleanup	Board
<b>Rev 5</b>	02/21/2012	Made revisions to account for retirement of Senior VP Energy Services	Board
<b>Rev 6</b>	02/14/2013	Changed VP Production to Chief Operating Officer. Changed Vice President of Governmental Relations and Enterprise Risk Management to Director Enterprise Risk Management/Strategic Planning. Under MISO, changed Aggregate Planning Resource Credits to Zonal Resource Credits.	
<b>Rev 7</b>	03/21/2014	Add date last reviewed line and correct section 4 to comply with Appendix	Board
<b>Rev 8</b>	08/15/2014	Remove reference to Chief Operating Officer	Board
<b>Rev 9</b>	02/20/2015	Added MATS reagents transaction authority; updated transaction authority for bilateral electric power and transmission and lime reagent; general clean up.	Board
<b>Rev 10</b>	02/23/2016	Made changes to clarify transaction authority for purchases and sales for energy, capacity and transmission. Changes implemented to be inclusive of transportation for items shipped in bulk by barge, rail and truck. Updated transaction authority amounts for various lime and MATS reagents.	Board
<b>Rev 11</b>	12/16/2016	Made changes to clarify language for speculation. Eliminated daily limits for both bilateral energy, capacity and transmission purchases and sales transactions and natural/synthetic gas and transportation transactions.	Board
<b>Rev 12</b>	8/16/2019	Added Renewable Energy Credits trading authority	Board
<b>Rev 13</b>	08/21/2020	Punctuation Changes	Board

**Energy Related Transaction Authority Policy**

Original Effective Date	<b>06/15/2007</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	



# BOARD POLICY

Policy Number: 105

Energy Related Transaction Authority Policy				
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Original Approval Date	06/15/2007	Date Last Revised	08/21/2020	<b>BOARD</b>

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## 1. Policy Purpose

The purpose of this policy is to define the authority granted by the Big Rivers Electric Corporation (“Big Rivers”) Board of Directors (“Board”) to the President & Chief Executive Officer (“CEO”) to execute, or to delegate authority to execute energy-related transactions. Furthermore, it sets forth clarity and empowerment among those with transaction authority and is designed to encourage communication among individuals with transaction authority and the Board.

## 2. Objective

The objective of Big Rivers’ Energy Related Transaction Authority Policy is to define:

- Who has authority to execute transactions,
- The commodities and products that can be transacted,
- The authorized lead-time and term for each transaction,
- The authorized maximum price and volume,
- Counterparty contract and credit requirements,
- The process for approving new commodities, products or locations,
- Big Rivers’ intention regarding hedging and speculating,
- Other relevant factors associated with due diligence in authorizing transactions to be executed.

## 3. Procedural Requirements

The following defines the procedural requirements that apply to all commodities and products transacted pursuant to this policy.

### Execution Authority

Execution Authority is outlined by commodity in the authority matrix sections found below. All column limits in these matrices are applied independently of one another for each authority level, in that no individual column limit may be exceeded without authorization, regardless of whether a transaction does not exceed another column limit for that same authority level. Limits for each level of authority are cumulative, and include all column limits up to and including that level. The authority granted in this policy should not violate any other policy limits.

The transaction limits apply to both purchases and sales.

This policy identifies Board-authorized levels for the CEO and explicitly gives the CEO the authority to delegate authority levels to Big Rivers’ staff and ACES Power Marketing (“ACES”). The CEO has the authority to modify delegated authority levels (noted in Appendix A) at his sole discretion as long as the delegated authority does not exceed his own authority per this policy.



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### Contract Requirements

Transactions with counterparties shall only be permitted if Big Rivers has either:

- An active, valid, and executed agreement enabling such transaction activity with that counterparty,
- Long-form confirmations may be used as a valid agreement in lieu of a permanent agreement, when necessary if approved in writing by the Big Rivers CEO.

### Credit Requirements

Credit limits for each counterparty shall not be intentionally exceeded. *(Note: Since credit exposures are a function of not only positions transacted, but also a function of market pricing and volatility, credit exposure to counterparty may unintentionally exceed a credit limit purely due to changes in the forward market.)*

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Entering into unsecured transactions with a counterparty that has total credit exposure greater than or equal to its open line of credit and the total of any security currently provided will not be allowed unless approved in writing by the Big Rivers CEO.

### Credit Slewing

All slewing transactions for credit purposes shall be approved by the CEO. *(Note: Slewing is an arrangement where a more financially reputable entity acts as middleman for a smaller, undercapitalized entity in the purchase or sale of power.)*

### Contract Slewing

This policy does not prohibit Big Rivers from being positioned between another member or customer of ACES and an external counterparty in order to bridge a contract gap that exists. The sleeve must:

- Be only for physical power, transmission or natural gas, not transportation,
- Be only for terms of one month or less.

Contract slewing on behalf of Big Rivers is approved when it is either the only or the most economical path to pursue at the discretion of ACES, with prompt after-the-fact notice to the Big Rivers CEO.

### Transaction Communications

All communications for bilateral electric power transactions must be transacted via a recorded communication method. Examples include, but are not limited to, voice recorded communication, instant messaging, email or via an online broker account. Recorded communications must be maintained and controlled by personnel who are independent of the transaction function.



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### Deal Capture

Power transactions executed by a Big Rivers employee must be promptly forwarded to ACES after the deal execution.

### Speculation

Speculation refers to a purchase or sale transaction in which the intent was to realize a profit without an underlying long or short generation position. No speculative transaction activities shall be permitted, and no speculative transaction positions shall be initiated. Transactions will be permitted only for purposes of hedging and portfolio optimization.

### Non-Standard Products

The Board must pre-approve any transaction that involves commodities or products not listed in this policy.

### Transactions Requiring Board Approval

Transactions which meet any of the following criteria must be pre-approved by the Board prior to execution:

- The transaction is a new commodity or within the list of commodities not previously transacted by Big Rivers,
- The transaction is at a location in which no transactions are permitted,
- The transaction is for something other than: physical spot or forward electricity, natural gas, fuel oil, solid fuel, ancillary services, capacity, power transmission, financial transmission rights, gas transportation, gas imbalance and storage, solid fuel transportation, exchange transacted energy products, over-the-counter (OTC) financial energy transactions, OTC energy options, federal SO2 or NOx emission allowances, renewable energy credits or a unit outage insurance product.

Examples of new instruments would include the use of derivatives with different risk characteristics or the use of derivatives to implement different business strategies or goals. New instruments or locations would also include those instruments or locations that may be transacted on a “one-off” basis, which would be implementation of a derivative instrument or entry into a commodity market that, despite the anticipation of being transacted just once, would still fit the definition of a new instrument or location.

The purpose of defining a process for such transactions as noted above is to ensure that the exposures associated with them are thoroughly reviewed and understood by the Board and appropriate transaction controls are in place. The Board must approve the use of such transactions prior to execution using the process defined below:



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- a) Transaction Proposal - The proposal is the responsibility of the person or business group proposing the transaction. The proposal should address the business need, risks, transaction controls, valuation methodology, accounting methodology, operations workflow/ methodology, and assessment of legal and regulatory issues.
- b) Board Review - The Board will perform a review of the benefits and risks of the proposed transaction. The Board will assess the proposed transaction and make a determination whether to add the proposed transaction to the approved list.
- c) Approval (Pilot Program) – The Board may approve limited use of the proposed transaction to ensure that proper controls are in place to monitor the activity. The Board may approve the proposed transaction without instituting a Pilot Program if the proposed transaction is going to be used once (one off), where it would not be prudent to test it in a shorter time frame or smaller quantity due to constraints such as liquidity or length of term of product. The Board will use more scrutiny in approval of one-off transactions.



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### 4. Bilateral Energy, Capacity and Transmission Purchases and Sales Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for energy, capacity and transmission transactions.

Purchases		Per Transaction Limits (up to)				Aggregate Limits (up to)	
Title	Product	Term	Lead Time	MW Size	Max. \$/MWH	Total Volume MWH	Total \$
Board	Energy, Capacity and Transmission	No Limit	No Limit	No Limit	No Limit	No Limit	No Limit
CEO	Energy	≤ 2 Years	≤ 3 Years	≤ 400	≤ \$150	7,008,000	\$350.4 million
	Capacity	≤ 3 Years	≤ 3 Years	≤ 100	≤ \$8	1,752,000	\$14.016 million
	Transmission	≤ 2 Years	≤ 3 Years	≤ 100	Tariff	1,752,000	Tariff

Sales		Per Transaction Limits (up to)				Aggregate Limits (up to)	
Title	Product	Term	Lead Time	MW Size	Min. \$/MWH	Total Volume MWH	Total \$
Board	Energy, Capacity and Transmission	No Limit	No Limit	No Limit	No Limit	No Limit	No Limit
CEO	Energy	≤ 2 Years	≤ 3 Years	≤ 400	No Limit	11,100,000	No Limit
	Capacity	≤ 2 Years	≤ 3 Years	≤ 500	No Limit	13,140,000	No Limit
	Transmission	≤ 2 Years	≤ 3 Years	≤ 100*	No Limit	2,628,000	No Limit

\*Lesser of 100 MW or rights to transmission capacity owned by Big Rivers.

### Energy, Capacity and Transmission Authority Matrix Explanations

- Transaction limits represent the MW volume per hour and dollars/MWH for each transaction executed.
- Aggregate Limits represent the sum total MWH volume and dollars for all physical and financial forward transactions, excluding options.



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- Lead time represents the time period from the date the transaction is executed to the start of the transaction.
- Authorized products include energy both forwards and options, transmission and capacity, including both physical and financial derivatives. Options may only be entered into by the Big Rivers CEO or his designee.
- Authority for PJM and MISO products is defined in the authority matrices below.

### Delivery Locations

Transactions at delivery locations outside the eastern interconnect are not permitted, unless approved by the CEO. Transaction at delivery locations that are normal to the daily course of business for Big Rivers, to the extent transmission is available, are authorized as follows:

#### **Unrestricted Delivery Locations**

- SERC Reliability Region
- MISO
- PJM
- RFC Reliability Region
- SPP

Transaction at any other delivery locations within the eastern interconnection shall be restricted as follows:

#### **Restricted Delivery Locations**

Other eastern interconnection locations only with approval by the Big Rivers CEO.

### Firmness of Energy

The product firmness of all transactions must be provided for in an executed agreement between Big Rivers and the appropriate counterparty. Sales commitments must never be more firm than the supply source, including the purchase side of back-to-back sales, swaps, sleeves or spreads unless the Big Rivers CEO gives explicit written authority to sell power that is more firm than the supply source. Energy purchased as firm liquidated damages may be resold as such.

### Transmission Firmness and Volume

Transmission purchases need to be of equal firmness and volume to the energy component that such transmission purchase is associated with, unless pre-approved otherwise by the Big Rivers CEO. (Note: Purchasing small percentages of additional transmission to cover transmission losses is permitted.) In addition, transmission may be reserved but not utilized if an energy schedule is not confirmed prior to scheduling deadlines outside of Big Rivers' or ACES's control. When this occurs it is not considered a violation of this policy.





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## 5. MISO Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for MISO products.

		MISO Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
Board	All MISO Products	No Limit	No Limit	No Max	No Max
CEO	Generation Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 3 Years	≤ 3 Years	500	
	Financial Transmission Rights	≤ 4 Years	≤ 4 Years	425	\$20
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
	Imports/Exports				

### MISO Authority Matrix Explanations

- Virtual transaction award limits are per each bid/offer nodal point. Virtual purchase awards and virtual sales awards are monitored separately.
- Imports and exports are per location and are monitored separately.
- Generation Award Limits are per generating unit.
- Demand Award Limits are per each load nodal point.
- Limits for Ancillary Service Awards apply to the Regulation and Operating (Spinning and Supplemental) Reserve Market only.
- Capacity limits apply to capacity transacted via the MISO Capacity Auction for each generating unit and excludes the capacity required for Big Rivers' native load.
- Only Financial Transmission Rights that are bought and sold via the annual and monthly auctions or in the secondary market are monitored per the limits above. Participation in the Annual Allocation of financial transmission rights is not considered a transaction subject to this Policy.
- Delivery lead time represents the time period between trade execution and start of flow.

Note that all MISO day-ahead transactions, such as price-sensitive offers and bids for importing and exporting from MISO, are financially firm. Hence an exception from the firmness of power for adjustments to these day ahead transactions intraday is acceptable due to the fact that these adjustments are hourly and non-firm.



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

The following outlines transaction limits, definitions, and procedural requirements for PJM products.

		PJM Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
Board	All PJM Products	No Limit	No Limit	No Max	No Max
CEO	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 4 Years	≤ 4 Years	425	\$20
	Financial Transmission Rights	As Required by PJM	1 Operating Day	No Max	PJM Price Cap
	Virtual Transaction Awards				
	Imports/Exports				

### PJM Authority Matrix Explanations

- Virtual transaction award limits are per each bid/offer nodal point. Incremental purchase awards and decremental sales awards are monitored separately.
- Imports and exports are per location and are each monitored separately.
- Only financial transmission rights that are bought and sold via the annual and monthly auctions or in the secondary market are monitored per the limits above. Participation in the Annual Allocation of financial transmission rights is not considered a transaction subject to this Policy.

Note that PJM RTO day-ahead transactions, such as price-sensitive offers and bids for importing and exporting from PJM are financially firm. Hence an exception from the firmness of power for adjustments to these day ahead transactions intraday is acceptable due to the fact that these adjustments are hourly and non-firm.



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

The following outlines transaction limits, definitions, and procedural requirements for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical Volume per Day MMBtu	\$/ MMBtu	Total Physical Volume MMBtu	Total \$
Board	Gas Products	No Limit	No Limit	No Max.	No Max.	No Max.	No Max.
CEO	Physical	> 1 Year ≤ 2 Years	≤ 2 Years	25,000	\$15	1.2 million	\$18 million
		≤ 1 Year		No Max.			

### Gas Authority Matrix Explanations

- Transaction limits represent the physical MMBtu volume per day and dollars/MMBtu for each transaction executed.
- Aggregate limits represent the total physical MMBtu volume and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.
- The dollar limits are based upon commodity gas only and do not include transportation, however, the term, lead time, and volume limits do apply to transportation.
- Gas products include physical gas, as well as transportation, imbalance and storage. The above authority matrix applies to both exchange transacted and OTC derivative products.

### Gas Firmness

The product firmness of all transactions must be provided for in an executed agreement between Big Rivers and the appropriate counterparty. Sales commitments of Gas must never be more firm than the Gas supply source unless pre-approved by the Big Rivers CEO.

### Transportation Firmness and Volume

Transportation purchases need to be of equal firmness and volume to the Gas component that such transportation purchase is associated with, unless pre-approved otherwise by the Big Rivers CEO.



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### Delivery Locations

Gas transactions may only be executed at the following locations:

- Pipelines and hubs that serve Big Rivers' gas powered generation unit(s).

Physical Gas transactions may only be executed at other locations upon approval of the Big Rivers CEO and such transactions must support the hedging needs of Big Rivers.



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### 8. 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 \$
Board of Directors	Renewable Energy Credits	No Limit	No Limit	No Max.	No Max.	No Max.	No Max.
CEO	Renewable Energy Credits	≤ 3 Years	≤ 4 Years	400,000	\$15	800,000	\$12 Million

#### Renewable Energy Credits Trading Authority Matrix Explanations

- The authority matrix above addresses authority for Renewable Energy Credits (RECs).
- 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 RECs. Lead time limits only apply to forward transactions and not to spot transactions.

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## 9. Fuel Oil Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for physical fuel oil transactions.

Fuel oil hedging will be conducted to hedge price risk associated with fuel oil used for plant start-up or to hedge potential fuel oil or diesel fuel price risk contained within solid fuel contracts.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical - Volume Gallons	\$/Gallon	Total Physical - Volume Gallons	Total \$
Board	Physical Fuel Oil	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Fuel Oil	> 1 Year	≤ 2 Years	1,000,000	\$6	6,000,000	\$36 million
		≤ 3 Years		No Max			

### Fuel Oil Authority Matrix Explanations

- Transaction limits represent the total gallons and dollars/gallon for each transaction executed.
- Aggregate limits represent the sum total gallon volume and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



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## 10. Solid Fuel Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for solid fuel transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
Board	Physical Solid Fuel	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Solid Fuel	> 3 Months	≤ 2 Years	2,500,000	\$2.50	4 million	\$240 million
		≤ 3 Years					
		≤ 3 Months		200,000	\$2.85		

### Solid Fuel Authority Matrix Explanations

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars/MMBtu for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



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## 11. Transportation Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements for transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board	Barge, Rail or Truck Transportation	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Barge, Rail or Truck Transportation	> 1 Year ≤ 3 Years	≤ 2 Years	3 million	\$25	6 million	\$150 million
		≤ 1 Year		No Max	No Max		

### Transportation Authority Matrix Explanations

- Authorized products include barge, rail and truck transportation transactions.
- Per transaction limits represent the total quantity in tons and dollars/ton for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.





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## 12. Emission Allowances Transaction Authority\*

The following outlines transaction limits, definitions, and procedural requirements for emissions transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
Board	Federal SO <sub>2</sub> and NO <sub>x</sub> Emission Allowances	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Federal SO <sub>2</sub> Emission Allowances	> 1 Year ≤ 2 Years	≤ 2 Years	5,000	\$500	20,000	\$10 million
		≤ 1 Year		No Max	No Max		
	Federal NO <sub>x</sub> Emission Allowances	> 1 Year ≤ 2 Years		2,500	\$2,500	12,500	\$30 million
		≤ 1 Year		No Max	No Max		

### Emission Allowance Authority Matrix Explanations

- The authority matrix above represents authority for SO<sub>2</sub> and NO<sub>x</sub> emission allowances.
- Per transaction limits represent the total quantity in tons and dollars/ton for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



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### 13. Limestone Reagent Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements 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 \$
Board	Physical Limestone Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Limestone Reagent	> 3 Months	≤ 2 Years	750,000	\$20	1.50 million	\$30 million
		≤ 3 Years					
		≤ 3 Months	No Max	No Max			

### Limestone Reagent Authority Matrix Explanations

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



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

The following outlines transaction limits, definitions, and procedural requirements 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 \$
Board	Physical Lime Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	Physical Lime Reagent	> 3 Months	≤ 2 Years	750,000	\$200	750,000	\$150 million
		≤ 3 Years					

### Bulk Lime and Lime Hydrate Reagent Authority Matrix Explanations

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



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### 15. MATS Reagent Transaction Authority

The following outlines transaction limits, definitions, and procedural requirements 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 \$
Board	MATS Reagent	No Limit	No Limit	No Max	No Max	No Max	No Max
CEO	MATS Reagent	> 3 Months	≤ 2 Years	25,000	\$4,000	25,000	\$100 million
		≤ 3 Years		No Max			
		≤ 3 Months	No Max				

### MATS Reagent Authority Matrix Explanations

- Authorized products include physical spot and forward transactions and options on physical forwards.
- Per transaction limits represent the total quantity in tons and dollars for each transaction executed.
- Aggregate limits represent the sum total quantity in tons and dollars for all forward transactions.
- Lead time represents the time period from the date a transaction is executed to the start of the transaction.



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## 16. Acknowledgements

### Clear Authority and Staff and ACES Authority Delegations

Where authority is further downward delegated, it must be approved by written signature of the next authority level up prior to any execution. In no case will the delegation of authority to Big Rivers' staff or ACES exceed that of the Big Rivers CEO.

### 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 their immediate supervisor and to the Director Strategic Planning and Risk Management 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).

### Policy Effective

This Transaction Authority Policy is in effect upon the Board's approval and shall remain in effect until a revised policy has been approved by the Board.

### Responsibility

It shall be the responsibility of the Board, the CEO, the Big Rivers-IRMC and the ACES-IRMC to ensure compliance with this policy.



## BOARD POLICY

Policy Number: 105

Energy Related Transaction Authority Policy				
Original Effective Date	06/15/2007	Date Last Reviewed	08/21/2020	Approved by
Original Approval Date	06/15/2007	Date Last Revised	08/21/2020	<b>BOARD</b>

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Number	Date	Notes	Approved by
		Replaced Risk Management Policy for Power Supply	Board
<b>Original</b>	06/15/2007	Trading Authority Policy w/o matrices	Board
<b>Rev 1</b>	10/16/2009	Name change to Energy Related Transaction Authority Policy with matrices	Board
<b>Rev 2</b>	11/19/2010	MISO Transaction Authority added	Board
<b>Rev 3</b>	12/17/2010	Updated Solid Fuel Transaction Authority	Board
<b>Rev 4</b>	03/18/2011	Added limestone and lime, general cleanup	Board
<b>Rev 5</b>	02/21/2012	Made revisions to account for retirement of Senior VP Energy Services	Board
<b>Rev 6</b>	02/14/2013	Changed VP Production to Chief Operating Officer. Changed Vice President of Governmental Relations and Enterprise Risk Management to Director Enterprise Risk Management/Strategic Planning. Under MISO, changed Aggregate Planning Resource Credits to Zonal Resource Credits.	Board
<b>Rev 7</b>	03/21/2014	Add date last reviewed line and correct section 4 to comply with Appendix	Board
<b>Rev 8</b>	08/15/2014	Remove reference to Chief Operating Officer	Board
<b>Rev 9</b>	02/20/2015	Added MATS reagents transaction authority; updated transaction authority for bilateral electric power and transmission and lime reagent; general clean up.	Board
<b>Rev 10</b>	02/23/2016	Made changes to clarify transaction authority for purchases and sales for energy, capacity and transmission. Changes implemented to be inclusive of transportation for items shipped in bulk by barge, rail and truck. Updated transaction authority amounts for various lime and MATS reagents.	Board
<b>Rev 11</b>	12/16/2016	Made changes to clarify language for speculation. Eliminated daily limits for both bilateral energy, capacity and transmission purchases and sales transactions and natural/synthetic gas and transportation transactions.	Board
<b>Rev 12</b>	8/16/2019	Added Renewable Energy Credits trading authority	Board
<b>Rev 13</b>	<u>08/21/2020</u>	<u>Punctuation Changes</u>	

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**BOARD POLICY**

Policy Number: 105

Energy Related Transaction Authority Policy				
Original Effective Date	06/15/2007	Date Last Reviewed	08/ <del>21</del> /2020	Approved by
Original Approval Date	06/15/2007	Date Last Revised	08/ <del>21</del> /2020	<b>BOARD</b>

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<b>Hedge Policy</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

## **1. Objective**

The Big Rivers Electric Corporation (“Big Rivers”) Hedge Policy will guide disciplined hedging of forward natural gas, solid fuel, fuel oil and purchased power resources (“Commodity/Commodities”). This Hedge Policy is designed to reduce Member-Owners’ wholesale rate volatility and to maintain rates within desired tolerances. The primary purpose of this policy is to identify specific time and volume (as a percent of total projected generation) criteria for procuring projected Commodity-related needs.

This policy largely employs a price-averaging strategy of declining percentage of Commodity supply positions held over forward time periods. This strategy protects Big Rivers from potential adverse impacts that could result in either significant Commodity price increases or decreases. The strategy also maintains some elements of procurement flexibility. For example, during times of extremely attractive market conditions, this policy allows for increasing the amount of forward Commodities hedged above the stated ranges with the concurrence of the Board of Directors (“Board”). A key component of the policy is a monthly compliance report for the Board, which is outlined herein.

Although this document is primarily concerned with managing Commodity costs and risks, a limited amount of discussion on capacity adequacy, transmission congestion risk, emission allowances and fuel transportation based on similar principles is included.

## **2. Hedge Policy Criteria**

The hedging criteria identified within this policy address the primary Commodity supply portfolio components that affect rates and reliability the most. Accordingly, the hedge criteria in the following sections represent the risk tolerance of Big Rivers and identify the processes Big Rivers will employ to manage these key Commodity supply risks.

### **a. Volumetric and Lead Time Criteria for Hedging**

This policy employs a total Commodity hedging methodology whereby the MWh equivalent of all Commodity hedges are compared to the expected generation of Big Rivers. To apply as a Commodity hedge, fuel purchases must be combined with physical generation ownership or contracted capacity. The MWh equivalent hedge from fuel purchases will be the volume of mmBTUs of fuel procured for the unit or contract divided by the expected average heat rate of the generation unit or contract divided by 1,000. The total Commodity hedge is the MWh equivalent of the sum of fuel purchases and electricity purchases.

#### **Rolling Monthly Hedge Ranges**

One criteria of this policy is to have Commodities procured within defined volumetric ranges during the following rolling timeframes. These ranges identify the percentage of Big Rivers’ projected total Commodity needs that will be procured with fixed price Commodities over a given time period. For purposes of this policy, Commodity needs are considered hedged or procured to the extent that the projected need is met by 1) authorized purchase transactions as defined in the Big Rivers Energy Related Transaction Authority Policy (Board Policy 105), or 2) authorized fuel transactions combined with physical generation unit ownership, heat rate transactions, or physical capacity transactions.



<b>Hedge Policy</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

Additionally, Commodity option transactions with out of the money strike prices may be used to hedge forward volumes, provided that they do not account for more than 15 percent of the projected Commodity needs in any given month, and they are not more than 50 percent out of the money at the time of the transaction.

<b>Lead Time</b>	<b>Months 1 thru 3</b>	<b>Months 4 thru 12</b>	<b>Quarters 5 thru 8</b>	<b>Quarters 9 thru 12</b>	<b>Years 4 thru 5</b>
<b>Measurement Period</b>	Rolling	Rolling	Rolling	Rolling	Calendar Year
<b>Hedging Frequency</b>	Monthly	Monthly	Quarterly	Quarterly	Annual
<b>Range (%)</b>	75-100	50-100	25-75	0-75	0-50

For the above table, Big Rivers will hedge projected Commodity needs based on the following criteria:

- Lead Time: The amount of time from the current period. Defined in months, quarters, or years.
- Measurement Period: This is the mechanism under which this volumetric range is measured. There are two measures - rolling, where the measurement period changes monthly and calendar year, where the measurement period is only changed at the change of a calendar year. In the case of conflict, the rolling criterion has precedence over calendar year.
- Hedging Frequency: This is primarily useful in conjunction with the rolling measurement period. This is the frequency that the rolling measurement period changes for policy compliance reporting purposes. The hedging frequency period prevents, for example, a situation where the transaction execution staff would have to hedge month 36 (the last month of quarter 12) at a time where monthly purchases are very illiquid (not readily available).
- Range: This is the range of overall Commodity needs that will be hedged with fixed price Commodities, of which up to 15 percent may be covered with options.

Commodity procurements that deviate from the stated range will require approval of the Board, and will be part of the regular reporting to the Board.

Commodity hedging will be a complementary hedging activity since Big Rivers has natural gas and coal-fired generation. Big Rivers may also hedge with Commodities if it enters a transaction that uses a natural gas, fuel oil, or coal index price to derive its electricity cost. Such natural gas, fuel oil, and coal-related generation or purchase transactions, while considered capacity, would not be considered Commodity hedges until the projected Commodity volumes are procured. In order to allow flexibility in overall Commodity hedging decisions, specific sub-targets for natural gas hedging are not set within this policy.

<b>Hedge Policy</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

**b. MISO Resource Adequacy Requirements**

Big Rivers will comply with all MISO capacity requirement rules.

**c. Congestion Hedging with Financial Transmission Rights (FTR)**

It will be Big Rivers’ policy to actively participate in the MISO FTR allocation and auction process with a prudent and predetermined strategy for addressing the planning year congestion risk.

Big Rivers will target to mitigate a minimum of 50% of congestion risk (measured by annual native load and non-member sales requirements) prior to or by the end of the MISO annual FTR auction.

Big Rivers will target to mitigate a minimum of 70% of congestion risk prior to the month of delivery.

**d. Emission Allowance Hedging**

This hedging policy calls for the establishment of an emission allowance procurement process to meet expected future requirements. Fixed price hedges for emission allowances include 1) actual or expected emission allowances allocated to Big Rivers from the EPA, 2) fixed price allowance purchases and sales, and 3) projected, budgeted, and Board-approved emission control equipment additions. Big Rivers will price average into its emission allowance position when purchasing emission allowances. Emission allowance needs will be managed similar to its approach for Commodities. Big Rivers will maintain fixed price allowance hedges based on the following table.

<b>Lead Time</b>	<b>Current Calendar Year</b>	<b>Calendar Year Two</b>	<b>Calendar Year Three</b>
<b>Minimum (%)</b>	80	70	60

Per applicable regulatory requirements, Big Rivers will hold enough allowances in all compliance accounts to cover emissions for the current reporting period. Specifically, all compliance accounts shall be populated with sufficient allowances to cover emissions for the current reporting period prior to the accounts being closed by the EPA, which is currently two (2) consecutive calendar months after the end of the reporting period. Furthermore, the Designated Representative will ensure that all compliance accounts have an adequate number of allowances prior to running “Final Compliance True up” after the accounts have been closed by the EPA.

Big Rivers will not buy emission allowances from the market for any given year if it results in emission allowances that exceed 105 percent of its expected needs without prior CEO approval.

**e. Resource Diversity Management**

Big Rivers will manage its resource diversity concentration risks on a rolling 12-month basis by diversifying its Commodity supply resources as follows:

<b>Hedge Policy</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	

Fuel supply contracts will be diversified such that no more than 60 percent (but not more than 1.5 million tons) will be from a single supplier that has the ability to source coal from multiple coal mining operations to supply Big Rivers for any rolling 12-month period. For fuel suppliers that have the ability to source coal from a single mining operation, no more than 35% (but not more than 1.0 million tons) will be from such supplier to supply Big Rivers for any rolling 12-month period.

Exceptions to these limits shall require approval of Big Rivers' Board.

**f. Risk Measurement and Compliance Reporting**

Risk measurement and policy compliance within the volumetric and lead time criteria will be provided to Big Rivers' Board monthly. This report will generally cover five years of projections.

**Responsibility**

It shall be the responsibility of the Board, CEO and IRMC to ensure compliance with this policy. Implementation of this policy shall adhere to the authority granted in the Energy Related Transaction Authority Policy (Board Policy 105).

<b>Number</b>	<b>Date</b>	<b>Notes</b>	<b>Approved by</b>
<b>Original</b>	06/15/2007	Approved to be effective at close of unwind	Board
<b>Rev 1</b>	03/16/2012	Update out-of-date language (joining MISO, old policy reference), general cleanup	Board
<b>Rev 2</b>	09/18/2015	Update terminology (I.E. energy to Commodity, coal to solid fuel, electricity to purchased power), removed Appendix A (out-of-date examples) and Appendix B (no longer applicable), updated emission allowance section to be more concise and clarified resource diversity language.	Board
<b>Rev 3</b>	09/16/2016	Clarified Policy Reference	Board
<b>Rev 4</b>	08/10/2018	Removed capacity resources from resource diversity management	Board
<b>Rev 5</b>	08/16/2019	Modified the resource diversity management requirements	Board
<b>Rev 6</b>	08/21/2020	Coal hedge percentage changes	Board



# BOARD POLICY

Policy Number: 111

Hedge Policy				
Original Effective Date	07/16/2009	Date Last Reviewed	08/21/2020	Approved by
Original Approval Date	06/15/2007	Date Last Revised	08/21/2020	BOARD

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Hedging Frequency	Monthly	Monthly	Quarterly	Quarterly	Annual
Range (%)	<del>75</del> -100	<del>50</del> -100	<del>25</del> -75	<del>0</del> -75	0-50

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**c. Congestion Hedging with Financial Transmission Rights (FTR)**

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Policy Number: 111

Hedge Policy				
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Original Approval Date	<b>06/15/2007</b>	Date Last Revised	<b>08/21/2020</b>	<b>BOARD</b>

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Exceptions to these limits shall require approval of Big Rivers' Board.

### f. Risk Measurement and Compliance Reporting

Risk measurement and policy compliance within the volumetric and lead time criteria will be provided to Big Rivers' Board monthly. This report will generally cover five years of projections.

#### Responsibility

It shall be the responsibility of the Board, CEO and IRMC to ensure compliance with this policy. Implementation of this policy shall adhere to the authority granted in the Energy Related Transaction Authority Policy (Board Policy 105).

Number	Date	Notes	Approved by
<b>Original</b>	06/15/2007	Approved to be effective at close of unwind	Board
<b>Rev 1</b>	03/16/2012	Update out-of-date language (joining MISO, old policy reference), general cleanup	Board
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<b>Rev 4</b>	08/10/2018	Removed capacity resources from resource diversity management	Board
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<b>Rev 6</b>	<u>08/21/2020</u>	<u>Coal hedge percentage changes</u>	<u>Board</u>

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<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/21/2020</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. ”Executive Vice President of Operations” 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>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/21/2020</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>08/21/2020</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>08/21/2020</b>	

2. Organizational Responsibility. The Executive Vice President of Operations 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 Executive Vice President of Operations 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 Executive Vice President of Operations 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>08/21/2020</b>	Approved by <b>BOARD</b>
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**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 Executive Vice President of Operations, 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

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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 Executive Vice President of Operations 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

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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 Executive Vice President of Operations. 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 Executive Vice President of Operations 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

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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 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 Executive Vice President of Operations 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



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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 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 Executive Vice President of Operations, 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

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Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.

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
<b>Rev 9</b>	08/21/2020	Change VP Production to Executive Vice President of Operations	Board





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## 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. "Executive Vice President of Operations" means Big Rivers’ principal individual responsible for power generation and fuel procurement, among other duties.

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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.



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2. Organizational Responsibility. The Executive Vice President of Operations 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 Executive Vice President of Operations 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 Executive Vice President of Operations, 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.

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2. Contract/Spot Mix. Subject to the approval of the ~~Executive Vice President of Operations~~, 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.
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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.

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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.
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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 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 Executive Vice President of Operations, 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

Deleted: VP Production



# BOARD POLICY

Policy Number: 120

## Fuel Procurement Policies and Procedures

Original Effective Date	07/16/2009	Date Last Reviewed	08/21/2020	Approved by <b>BOARD</b>
Original Approval Date	12/20/2007	Date Last Revised	08/21/2020	

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 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 Executive Vice President of Operations, 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.

Deleted: VP Production

### 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





## BOARD POLICY

Policy Number: 120

### Fuel Procurement Policies and Procedures

Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b><u>08/21/2020</u></b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b><u>08/21/2020</u></b>	

Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.

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>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
<b><u>Rev 9</u></b>	<b><u>08/21/2020</u></b>	<b><u>Change VP Production to Executive Vice President of Operations</u></b>	<b><u>Board</u></b>

**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’s Request for Information  
in Appendix B of the Commission’s Order dated March 4, 2021**

**March 22, 2021**

1 Item 12) *For the last six months of the period under review and for the*  
2 *years 2021 and 2022, list all firm power commitments for a) purchases and*  
3 *(b) sales. This list shall identify the electric utility, the amount of*  
4 *commitment in MW, and the purpose of the commitment (i.e., peaking,*  
5 *emergency).*

6

7 **Response)**

8 (a) Purchases:

9 Big Rivers has a contract with Southeastern Power Administration  
10 (“SEPA”) to purchase up to 178 MWs of energy. A force majeure, previously  
11 in effect due to dam safety issues on SEPA’s Cumberland River System,  
12 ceased on January 1, 2020. The lifting of the force majeure raised Big  
13 Rivers’ SEPA Cumberland hydropower allocation of dependable capacity  
14 from 154 MWs to 178 MWs.

15 Big Rivers has a Grandfathered Transmission Agreement with  
16 Associated Electric Cooperative, Inc. (“AECI”) under which Big Rivers may  
17 purchase (or sell) [REDACTED]. Big Rivers reimburses AECI at

**BIG RIVERS ELECTRIC CORPORATION**

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**March 22, 2021**

1 the locational marginal price at the AECI/MISO interface, plus a share of  
2 MISO congestion and losses between the AECI/MISO interface and Big  
3 Rivers load. If Big Rivers is the seller, AECI reimburses Big Rivers at the  
4 locational marginal price at a Big Rivers generator, plus a share of MISO  
5 congestion and losses between the Big Rivers generator and the  
6 AECI/MISO interface. Big Rivers uses this agreement for economic energy  
7 when AECI market prices are below the cost of purchasing load from MISO.

8 Big Rivers has a Grandfathered Transmission Agreement with  
9 Southern Illinois Power Cooperative, Inc. (“SIPC”) under which Big Rivers  
10 may [REDACTED] during the months of March,  
11 April, October, and November. Big Rivers may [REDACTED]  
12 [REDACTED]. Big Rivers reimburses SIPC at the locational  
13 marginal price at SIPC generator node, plus a share of MISO congestion  
14 and losses between the SIPC generator and Big Rivers load. If Big Rivers  
15 is the seller, SIPC reimburses Big Rivers at the locational marginal price  
16 at a Big Rivers generator, plus a share of MISO congestion and losses  
17 between the Big Rivers generator and SIPC load. Big Rivers uses this

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1 agreement for economic energy when SIPC market prices are below the cost  
2 of purchasing load from MISO.

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

7 (a) Purchases:

<b>Big Rivers Electric Corporation Power Purchases May 1, 2020 through October 31, 2020</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
May – Oct 2020		50 MWs – Off-Peak 117,600 Total	Off-System Sales Adjustments
May – Oct 2020		50 MWs – Off-Peak 117,600 Total	Off-System Sales Adjustments
June 2020		100 MWs – 7 x 24 72,000 Total	Purchases for Off-System Sales
October 2020		100 MWs – 7 x 24 74,400 Total	Purchases for Off-System Sales
May – Oct 2020	MISO	50 MWs – Off-Peak 117,600 Total	Purchases for Off-System Sales
May – Oct 2020	MISO	50 MWs – Off-Peak 117,600 Total	Purchases for Off-System Sales

8

**BIG RIVERS ELECTRIC CORPORATION**

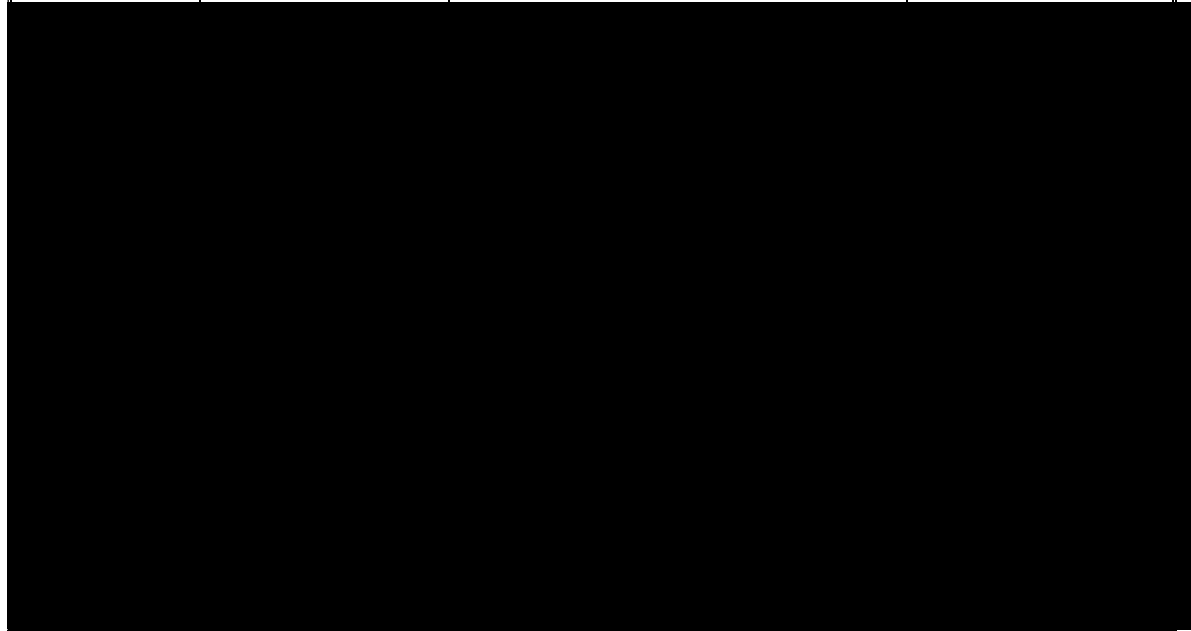
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1 (a) Purchases (continued):

<b>Big Rivers Electric Corporation Power Purchases January 1, 2021 through December 31, 2022</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Jan – Feb 2021	MISO	150 MWs – 7 x 24 212,400 Total	Purchases for Off-System Sales
Jan – Feb 2021	MISO	50 MWs – On-Peak 32,000 Total	Purchases for Off-System Sales
Jan – Feb 2021	MISO	50 MWs – Off-Peak 38,800 Total	Purchases for Off-System Sales



2

3

**BIG RIVERS ELECTRIC CORPORATION**

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1 (a) Purchases (continued):

<b>Big Rivers Electric Corporation Power Purchases January 1, 2021 through December 31, 2022</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>

2  
3

**BIG RIVERS ELECTRIC CORPORATION**  
**AN ELECTRONIC EXAMINATION OF**  
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**March 22, 2021**

1 (b) Sales:

2 Big Rivers has a contract to [REDACTED] to the Kentucky  
3 Municipal Energy Agency (“KYMEA”). KYMEA uses this as a baseload  
4 resource.

5 Big Rivers has a second contract to [REDACTED] 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 [REDACTED] 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 [REDACTED] contract terminated on [REDACTED]  
13 [REDACTED]  
14 [REDACTED], net of OMU’s SEPA  
15 allocation of capacity and energy. The price is contractually specified.  
16

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**March 22, 2021**

1 (b) Sales (continued) –

<b>Big Rivers Electric Corporation Firm Off-System Sales May 1, 2020 through October 31, 2020</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
May – Oct 2020		50 MWs – Off-Peak 117,600 Total	Off-System Sales
May – Oct 2020		50 MWs – Off-Peak 117,600 Total	Off-System Sales
July 2020		2 MWs - On-Peak 672 Total	Off-System Sales
July 2020		23 MWs – On-Peak 7,728 Total	Off-System Sales
July 2020		50 MWs – On-Peak 800 Total	Off-System Sales
August 2020		50 MWs – On-Peak 4,000 Total	Off-System Sales
October 2020		50 MW – Off-Peak 800 Total	Off-System Sales
May – Oct 2020	MISO	50 MWs – Off-Peak 117,600 Total	Off-System Sales
May – Oct 2020	MISO	50 MWs – Off-Peak 117,600 Total	Off-System Sales
June 2020	MISO	100 MWs – 7 x 24 72,000 Total	Off-System Sales
October 2020	MISO	100 MWs – 7 x 24 74,400 Total	Off-System Sales

2



**BIG RIVERS ELECTRIC CORPORATION**

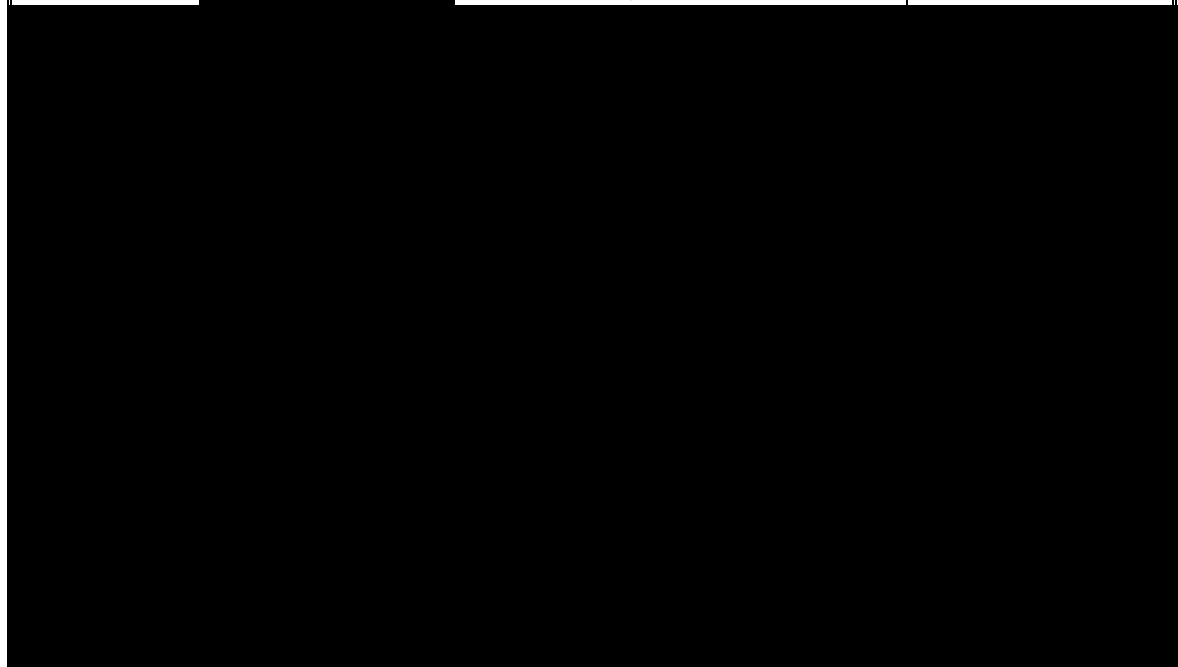
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1 (b) Sales (continued) –

<b>Big Rivers Electric Corporation Firm Off-System Sales January 1, 2021 through December 31, 2022</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Jan – Feb 2021		150 MWs - 7 x 24 212,400 Total	Off-System Sales
Jan – Feb 2021		50 MWs – On-Peak 32,000 Total	Off-System Sales
Jan – Feb 2021		50 MWs – Off-Peak 38,800 Total	Off-System Sales



2

3

**BIG RIVERS ELECTRIC CORPORATION**

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**March 22, 2021**

1 (b) Sales (continued) –

<b>Big Rivers Electric Corporation Firm Off-System Sales January 1, 2021 through December 31, 2022</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Feb 2021		50 MWs – On-Peak 4,000 Total	Off-System Sales
Feb 2021		50 MWs – Off-Peak 1,600 Total	Off-System Sales
Feb 2021		50 MWs – Off-Peak 1,600 Total	Off-System Sales

2

3

**BIG RIVERS ELECTRIC CORPORATION**

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**March 22, 2021**

1 (b) Sales (continued) –

Big Rivers Electric Corporation Firm Off-System Sales January 1, 2021 through December 31, 2022			
Date	Electric Utility	MW Commitment	Purpose

2  
3  
4  
5  
6

**Witness)** Natalie R. Hankins

**BIG RIVERS ELECTRIC CORPORATION**

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**March 22, 2021**

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

3

4 **Response)** Please see the attached monthly billing summaries for sales to all  
5 electric utilities for the period May 1, 2020, through October 31, 2020.

6

7

8 **Witness)** Jennifer M. Stone

9

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

1	Member Billing May 2020	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	105,900	42,067,681	1,461,949.50	\$ 1,893,045.65	\$ 3,354,995.15
4	KENERGY	197,042	76,035,721	2,720,164.81	3,421,607.45	6,141,772.26
5	MEADE CO. RURALS	75,280	31,352,148	1,039,240.40	1,410,846.66	2,450,087.06
6						
7	<b>TOTAL RURALS</b>	<b>378,222</b>	<b>149,455,550</b>	<b>\$ 5,221,354.71</b>	<b>\$ 6,725,499.76</b>	<b>\$ 11,946,854.47</b>
8						
9		4,680	1,304,625	50,146.20	\$ 49,640.98	\$ 99,787.18
10		3	23	32.15	0.88	33.03
11		40,800	10,097,496	437,172.00	384,209.72	821,381.72
12		1,620	325,359	17,358.30	12,379.91	29,738.21
13		15,000	5,493,460	160,725.00	209,026.15	369,751.15
14		85	27,918	910.78	1,062.28	1,973.06
15		2,759	973,884	29,562.69	37,056.29	66,618.98
16		100	18,168	1,071.50	691.29	1,762.79
17		36,288	25,640,687	388,825.92	975,628.14	1,364,454.06
18		135	67,055	1,446.53	2,551.44	3,997.97
19		3,357	1,266,828	35,970.26	48,202.81	84,173.07
20		100	0	1,071.50	-	1,071.50
21		250	24,893	2,678.75	947.18	3,625.93
22		7,258	4,441,937	77,769.47	169,015.70	246,785.17
23		12,662	6,759,017	135,673.33	257,180.60	392,853.93
24		6,346	3,200,190	67,997.39	121,767.23	189,764.62
25		3,000	118,547	32,145.00	4,510.71	36,655.71
26		2,760	14,108	29,573.40	536.81	30,110.21
27		800	9,493	8,572.00	361.21	8,933.21
28		7,200	818,574	77,148.00	31,146.74	108,294.74
29						
30	<b>Sub-Total Kenergy Industrials</b>	<b>145,203</b>	<b>60,602,262</b>	<b>\$ 1,555,850.17</b>	<b>\$ 2,305,916.07</b>	<b>\$ 3,861,766.24</b>
31						
32		100	4,344	1,071.50	165.29	1,236.79
33						
34	<b>TOTAL INDUSTRIALS</b>	<b>145,303</b>	<b>60,606,606</b>	<b>\$ 1,556,921.67</b>	<b>\$ 2,306,081.36</b>	<b>\$ 3,863,003.03</b>
35						
36	<b>GRAND TOTAL</b>	<b>523,525</b>	<b>210,062,156</b>	<b>\$ 6,778,276.38</b>	<b>\$ 9,031,581.12</b>	<b>\$ 15,809,857.50</b>

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

1	Member Billing May 2020	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (131,671.84)	\$ 151,658.12
4	KENERGY	-	-	-	(237,991.81)	277,663.25
5	MEADE CO. RURALS	-	-	-	(98,132.22)	110,731.88
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (467,795.87)</b>	<b>\$ 540,053.25</b>
8						
9		\$ -	\$ -	\$ -	\$ (4,083.48)	\$ 4,508.96
10		-	-	-	(0.07)	1.51
11		-	-	(118,161.81)	(31,605.16)	31,745.38
12		-	-	-	(1,018.37)	1,345.86
13		-	85.72	-	(17,194.53)	16,685.48
14		-	-	-	(87.38)	89.08
15		-	-	-	(3,048.26)	3,006.80
16		-	-	-	(56.87)	79.82
17		-	-	-	(80,255.35)	61,393.41
18		-	-	-	(209.88)	180.16
19		-	-	-	(3,965.17)	3,797.87
20		-	-	-	-	48.88
21		-	-	-	(77.92)	164.59
22		-	-	-	(13,903.26)	11,110.60
23		-	-	-	(21,155.72)	17,697.23
24		-	-	-	(10,016.59)	8,550.65
25		-	-	-	(371.05)	1,668.36
26		-	-	36.42	(44.16)	1,373.23
27		-	-	38.56	(29.71)	407.24
28		-	-	3,100.49	(2,562.14)	4,913.33
29						
30	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 85.72</b>	<b>\$ (114,986.34)</b>	<b>\$ (189,685.07)</b>	<b>\$ 168,768.44</b>
31						
32		-	-	-	(13.60)	56.28
33						
34	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 85.72</b>	<b>\$ (114,986.34)</b>	<b>\$ (189,698.67)</b>	<b>\$ 168,824.72</b>
35						
36	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 85.72</b>	<b>\$ (114,986.34)</b>	<b>\$ (657,494.54)</b>	<b>\$ 708,877.97</b>

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

	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1 Member Billing May 2020				
2				
3 JP RURALS	\$ 100,878.30	\$ 3,475,865.73	\$ (153,824.26)	\$ 3,322,041.47
4 KENERGY	182,333.66	6,363,777.36	(278,031.46)	6,085,745.90
5 MEADE CO. RURALS	75,182.45	2,537,869.17	(114,641.95)	2,423,227.22
6				
7 <b>TOTAL RURALS</b>	<b>\$ 358,394.41</b>	<b>\$ 12,377,512.26</b>	<b>\$ (546,497.67)</b>	<b>\$ 11,831,014.59</b>
8				
9	\$ 3,128.49	\$ 103,341.15	\$ (3,089.53)	\$ 100,251.62
10	0.06	34.53	(0.05)	34.48
11	24,213.80	727,573.93	(23,912.23)	703,661.70
12	780.21	30,845.91	(770.49)	30,075.42
13	13,173.32	382,501.14	(13,009.25)	369,491.89
14	66.95	2,041.71	(66.11)	1,975.60
15	2,335.37	68,912.89	(2,306.29)	66,606.60
16	43.57	1,829.31	(43.02)	1,786.29
17	61,486.37	1,407,078.49	(60,720.60)	1,346,357.89
18	160.80	4,129.05	(158.80)	3,970.25
19	3,037.85	87,043.62	(3,000.02)	84,043.60
20	-	1,120.38	-	1,120.38
21	59.69	3,772.29	(58.95)	3,713.34
22	10,651.76	254,644.27	(10,519.11)	244,125.16
23	16,208.12	405,603.56	(16,006.26)	389,597.30
24	7,674.06	195,972.74	(7,578.48)	188,394.26
25	284.28	38,237.30	(280.74)	37,956.56
26	33.83	31,509.53	(33.41)	31,476.12
27	22.76	9,372.06	(22.48)	9,349.58
28	1,962.94	115,709.36	(1,938.49)	113,770.87
29				
30 <b>Sub-Total Kenergy Industrials</b>	<b>\$ 145,324.23</b>	<b>\$ 3,871,273.22</b>	<b>\$ (143,514.31)</b>	<b>\$ 3,727,758.91</b>
31				
32	10.42	1,289.89	(10.30)	1,279.59
33				
34 <b>TOTAL INDUSTRIALS</b>	<b>\$ 145,334.65</b>	<b>\$ 3,872,563.11</b>	<b>\$ (143,524.61)</b>	<b>\$ 3,729,038.50</b>
35				
36 <b>GRAND TOTAL</b>	<b>\$ 503,729.06</b>	<b>\$ 16,250,075.37</b>	<b>\$ (690,022.28)</b>	<b>\$ 15,560,053.09</b>

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

1	Member Billing June 2020	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	127,018	55,267,767	1,753,483.49	\$ 2,487,049.52	\$ 4,240,533.01
4	KENERGY	222,604	99,672,305	3,073,048.22	4,485,253.73	7,558,301.95
5	MEADE CO. RURALS	86,949	37,221,708	1,200,330.95	1,674,976.86	2,875,307.81
6						
7	<b>TOTAL RURALS</b>	<b>436,571</b>	<b>192,161,780</b>	<b>\$ 6,026,862.66</b>	<b>\$ 8,647,280.11</b>	<b>\$ 14,674,142.77</b>
8						
9		4,884	1,567,031	52,332.06	\$ 59,625.53	\$ 111,957.59
10		3	17	32.15	0.65	32.80
11		40,800	17,950,886	437,172.00	683,031.21	1,120,203.21
12		1,620	315,460	17,358.30	12,003.25	29,361.55
13		15,000	9,086,504	160,725.00	345,741.48	506,466.48
14		84	33,511	900.06	1,275.09	2,175.15
15		3,396	1,067,973	36,388.14	40,636.37	77,024.51
16		100	16,475	1,071.50	626.87	1,698.37
17		36,245	22,801,680	388,365.18	867,603.92	1,255,969.10
18		126	63,508	1,350.09	2,416.48	3,766.57
19		3,387	1,626,696	36,291.71	61,895.78	98,187.49
20		100	0	1,071.50	-	1,071.50
21		250	23,677	2,678.75	900.91	3,579.66
22		7,416	4,397,875	79,462.44	167,339.14	246,801.58
23		13,388	7,502,652	143,452.42	285,475.91	428,928.33
24		2,081	1,138,484	22,297.92	43,319.32	65,617.24
25		3,000	128,922	32,145.00	4,905.48	37,050.48
26		2,760	13,621	29,573.40	518.28	30,091.68
27		800	10,520	8,572.00	400.29	8,972.29
28		7,200	490,933	77,148.00	18,680.00	95,828.00
29						
30	<b>Sub-Total Kenergy Industrials</b>	<b>142,640</b>	<b>68,236,425</b>	<b>\$ 1,528,387.62</b>	<b>\$ 2,596,395.96</b>	<b>\$ 4,124,783.58</b>
31						
32		100	5,375	1,071.50	204.52	1,276.02
33						
34	<b>TOTAL INDUSTRIALS</b>	<b>142,740</b>	<b>68,241,800</b>	<b>\$ 1,529,459.12</b>	<b>\$ 2,596,600.48</b>	<b>\$ 4,126,059.60</b>
35						
36	<b>GRAND TOTAL</b>	<b>579,311</b>	<b>260,403,580</b>	<b>\$ 7,556,321.78</b>	<b>\$ 11,243,880.59</b>	<b>\$ 18,800,202.37</b>



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

1	Member Billing June 2020	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (92,407.71)	\$ 218,838.21
4	KENERGY	-	-	-	(166,652.09)	390,099.16
5	MEADE CO. RURALS	-	-	-	(62,234.70)	148,374.61
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (321,294.50)</b>	<b>\$ 757,311.98</b>
8						
9		\$ -	\$ -	\$ -	\$ (2,620.08)	\$ 5,781.72
10		-	-	-	(0.03)	1.68
11		-	-	(118,161.81)	(30,013.88)	51,893.18
12		-	375.03	-	(527.45)	1,512.75
13		-	-	-	(15,192.63)	26,229.11
14		-	128.58	-	(56.03)	112.44
15		-	-	-	(1,785.65)	3,977.33
16		-	-	-	(27.55)	87.44
17		-	-	-	(38,124.41)	65,054.65
18		-	-	-	(106.19)	194.91
19		-	407.17	-	(2,719.84)	5,079.97
20		-	-	-	-	54.78
21		-	-	-	(39.59)	183.88
22		-	-	-	(7,353.25)	12,780.36
23		-	-	-	(12,544.43)	22,206.38
24		-	-	-	(1,903.55)	3,396.78
25		-	-	-	(215.56)	1,898.90
26		-	-	49.32	(22.77)	1,538.87
27		-	-	(17.67)	(17.59)	459.08
28		-	-	1,648.76	(820.84)	4,917.19
29						
30	<b>Sub-Total Kenergy Industrials</b>	<b>\$ -</b>	<b>\$ 910.78</b>	<b>\$ (116,481.40)</b>	<b>\$ (114,091.32)</b>	<b>\$ 207,361.40</b>
31						
32		-	-	-	(8.99)	65.43
33						
34	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 910.78</b>	<b>\$ (116,481.40)</b>	<b>\$ (114,100.31)</b>	<b>\$ 207,426.83</b>
35						
36	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 910.78</b>	<b>\$ (116,481.40)</b>	<b>\$ (435,394.81)</b>	<b>\$ 964,738.81</b>

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

	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
1 Member Billing June 2020				
2				
3 JP RURALS	\$ 132,532.11	\$ 4,499,501.62	\$ (163,477.78)	\$ 4,336,023.84
4 KENERGY	239,014.19	8,020,763.21	(294,822.95)	7,725,940.26
5 MEADE CO. RURALS	89,257.66	3,050,705.38	(110,098.93)	2,940,606.45
6				
7 <b>TOTAL RURALS</b>	<b>\$ 460,803.96</b>	<b>\$ 15,570,970.21</b>	<b>\$ (568,399.66)</b>	<b>\$ 15,002,570.55</b>
8				
9	\$ 3,757.74	\$ 118,876.97	\$ (3,427.83)	\$ 115,449.14
10	0.04	34.49	(0.04)	34.45
11	43,046.22	1,066,966.92	(39,266.98)	1,027,699.94
12	756.47	31,478.35	(690.06)	30,788.29
13	21,789.44	539,292.40	(19,876.43)	519,415.97
14	80.36	2,440.50	(73.31)	2,367.19
15	2,561.00	81,777.19	(2,336.15)	79,441.04
16	39.51	1,797.77	(36.04)	1,761.73
17	54,678.43	1,337,577.77	(49,877.93)	1,287,699.84
18	152.29	4,007.58	(138.92)	3,868.66
19	3,900.82	104,855.61	(3,558.35)	101,297.26
20	-	1,126.28	-	1,126.28
21	56.78	3,780.73	(51.79)	3,728.94
22	10,546.10	262,774.79	(9,620.20)	253,154.59
23	17,991.36	456,581.64	(16,411.81)	440,169.83
24	2,730.08	69,840.55	(2,490.40)	67,350.15
25	309.15	39,042.97	(282.01)	38,760.96
26	32.66	31,689.76	(29.79)	31,659.97
27	25.23	9,421.34	(23.01)	9,398.33
28	1,177.26	102,750.37	(1,073.89)	101,676.48
29				
30 <b>Sub-Total Kenergy Industrials</b>	<b>\$ 163,630.94</b>	<b>\$ 4,266,113.98</b>	<b>\$ (149,264.94)</b>	<b>\$ 4,116,849.04</b>
31				
32	12.89	1,345.35	(11.76)	1,333.59
33				
34 <b>TOTAL INDUSTRIALS</b>	<b>\$ 163,643.83</b>	<b>\$ 4,267,459.33</b>	<b>\$ (149,276.70)</b>	<b>\$ 4,118,182.63</b>
35				
36 <b>GRAND TOTAL</b>	<b>\$ 624,447.79</b>	<b>\$ 19,838,429.54</b>	<b>\$ (717,676.36)</b>	<b>\$ 19,120,753.18</b>

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

		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	Member Billing July 2020					
2						
3	JP RURALS	134,488	67,459,733	1,856,606.84	\$ 3,035,687.99	\$ 4,892,294.83
4	KENERGY	235,088	120,947,704	3,245,389.84	5,442,646.68	8,688,036.52
5	MEADE CO. RURALS	90,717	45,912,565	1,252,348.19	2,066,065.43	3,318,413.62
6						
7	<b>TOTAL RURALS</b>	<b>460,293</b>	<b>234,320,002</b>	<b>\$ 6,354,344.87</b>	<b>\$ 10,544,400.10</b>	<b>\$ 16,898,744.97</b>
8						
9		5,103	2,029,969	54,678.65	\$ 77,240.32	\$ 131,918.97
10		3	16	32.15	0.61	32.76
11		40,800	17,397,198	437,172.00	661,963.38	1,099,135.38
12		1,726	421,381	18,494.09	16,033.55	34,527.64
13		15,000	11,160,000	160,725.00	424,638.00	585,363.00
14		91	37,254	975.07	1,417.51	2,392.58
15		1,800	247,750	19,287.00	9,426.89	28,713.89
16		100	16,082	1,071.50	611.92	1,683.42
17		34,258	18,119,242	367,074.47	689,437.16	1,056,511.63
18		100	27,550	1,071.50	1,048.28	2,119.78
19		3,372	1,594,257	36,130.98	60,661.48	96,792.46
20		19	0	203.59	-	203.59
21		250	24,807	2,678.75	943.91	3,622.66
22		7,477	4,560,813	80,116.06	173,538.93	253,654.99
23		14,217	7,564,944	152,335.16	287,846.12	440,181.28
24		2,011	1,136,000	21,547.87	43,224.80	64,772.67
25		3,000	150,422	32,145.00	5,723.56	37,868.56
26		2,760	15,046	29,573.40	572.50	30,145.90
27		800	13,660	8,572.00	519.76	9,091.76
28		7,200	403,081	77,148.00	15,337.23	92,485.23
29						
30	<b>TOTAL INDUSTRIALS</b>	<b>140,087</b>	<b>64,919,472</b>	<b>\$ 1,501,032.24</b>	<b>\$ 2,470,185.91</b>	<b>\$ 3,971,218.15</b>
31						
32	<b>GRAND TOTAL</b>	<b>600,380</b>	<b>299,239,474</b>	<b>\$ 7,855,377.11</b>	<b>\$ 13,014,586.01</b>	<b>\$ 20,869,963.12</b>

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

1	Member Billing July 2020	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (117,245.02)	\$ 381,796.20
4	KENERGY	-	-	-	(210,207.11)	678,075.67
5	MEADE CO. RURALS	-	-	-	(79,796.04)	258,977.93
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (407,248.17)</b>	<b>\$ 1,318,849.80</b>
8						
9		\$ -	\$ -	\$ -	\$ (3,528.09)	\$ 10,305.76
10		-	-	-	(0.03)	2.53
11		-	-	(118,161.81)	(30,236.33)	76,753.04
12		-	-	-	(732.36)	2,691.75
13		-	-	-	(19,396.08)	45,839.55
14		-	139.30	-	(64.75)	186.94
15		-	-	-	(430.59)	2,233.28
16		-	-	-	(27.95)	131.01
17		-	-	-	(31,491.24)	82,631.74
18		-	-	-	(47.88)	165.34
19		-	1,242.94	-	(2,770.82)	7,566.96
20		-	-	-	-	15.74
21		-	-	-	(43.11)	281.43
22		-	-	-	(7,926.69)	19,849.58
23		-	-	-	(13,147.87)	34,428.21
24		-	-	-	(1,974.37)	5,067.27
25		-	-	-	(261.43)	2,936.30
26		-	-	30.76	(26.15)	2,332.15
27		-	-	(45.42)	(23.74)	703.82
28		-	-	1,973.21	(700.55)	7,173.06
29						
30	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 1,382.24</b>	<b>\$ (116,203.26)</b>	<b>\$ (112,830.03)</b>	<b>\$ 301,295.46</b>
31						
32	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 1,382.24</b>	<b>\$ (116,203.26)</b>	<b>\$ (520,078.20)</b>	<b>\$ 1,620,145.26</b>

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

1	Member Billing July 2020	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 161,768.44	\$ 5,318,620.45	\$ (151,979.79)	\$ 5,166,640.66
4	KENERGY	290,032.59	9,445,937.67	(272,482.63)	9,173,455.04
5	MEADE CO. RURALS	110,098.33	3,607,693.84	(103,436.25)	3,504,257.59
6					
7	<b>TOTAL RURALS</b>	<b>\$ 561,899.36</b>	<b>\$ 18,372,251.96</b>	<b>\$ (527,898.67)</b>	<b>\$ 17,844,353.29</b>
8					
9		\$ 4,867.87	\$ 143,564.51	\$ (4,335.14)	\$ 139,229.37
10		0.04	35.30	(0.04)	35.26
11		41,718.48	1,069,208.76	(37,152.93)	1,032,055.83
12		1,010.47	37,497.50	(899.89)	36,597.61
13		26,761.68	638,568.15	(23,832.96)	614,735.19
14		89.34	2,743.41	(79.56)	2,663.85
15		594.10	31,110.68	(529.08)	30,581.60
16		38.56	1,825.04	(34.35)	1,790.69
17		43,449.94	1,151,102.07	(38,694.91)	1,112,407.16
18		66.06	2,303.30	(58.83)	2,244.47
19		3,823.03	106,654.57	(3,404.65)	103,249.92
20		-	219.33	-	219.33
21		59.49	3,920.47	(52.97)	3,867.50
22		10,936.83	276,514.71	(9,739.93)	266,774.78
23		18,140.74	479,602.36	(16,155.47)	463,446.89
24		2,724.13	70,589.70	(2,426.01)	68,163.69
25		360.71	40,904.14	(321.23)	40,582.91
26		36.08	32,518.74	(32.13)	32,486.61
27		32.76	9,759.18	(29.17)	9,730.01
28		966.59	101,897.54	(860.80)	101,036.74
29					
30	<b>TOTAL INDUSTRIALS</b>	<b>\$ 155,676.90</b>	<b>\$ 4,200,539.46</b>	<b>\$ (138,640.05)</b>	<b>\$ 4,061,899.41</b>
31					
32	<b>GRAND TOTAL</b>	<b>\$ 717,576.26</b>	<b>\$ 22,572,791.42</b>	<b>\$ (666,538.72)</b>	<b>\$ 21,906,252.70</b>

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

1	Member Billing August 2020	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	136,466	58,281,668	1,883,913.13	\$ 2,622,675.06	\$ 4,506,588.19
4	KENERGY	245,620	105,166,594	3,390,784.10	4,732,496.73	8,123,280.83
5	MEADE CO. RURALS	87,083	39,735,868	1,202,180.82	1,788,114.06	2,990,294.88
6						
7	<b>TOTAL RURALS</b>	<b>469,169</b>	<b>203,184,130</b>	<b>\$ 6,476,878.05</b>	<b>\$ 9,143,285.85</b>	<b>\$ 15,620,163.90</b>
8						
9		5,027	2,149,406	53,864.31	\$ 81,784.90	\$ 135,649.21
10		3	16	32.15	0.61	32.76
11		40,800	19,688,435	437,172.00	749,144.95	1,186,316.95
12		1,732	351,624	18,558.38	13,379.29	31,937.67
13		15,000	11,153,374	160,725.00	424,385.88	585,110.88
14		89	35,934	953.64	1,367.29	2,320.93
15		1,800	60,552	19,287.00	2,304.00	21,591.00
16		100	16,863	1,071.50	641.64	1,713.14
17		35,726	13,540,641	382,804.09	515,221.39	898,025.48
18		3,410	1,513,508	36,538.15	57,588.98	94,127.13
19		250	23,186	2,678.75	882.23	3,560.98
20		7,568	4,680,031	81,091.12	178,075.18	259,166.30
21		13,926	7,441,001	149,217.09	283,130.09	432,347.18
22		2,087	1,175,657	22,362.21	44,733.75	67,095.96
23		3,000	170,656	32,145.00	6,493.46	38,638.46
24		2,760	18,830	29,573.40	716.48	30,289.88
25		800	14,760	8,572.00	561.62	9,133.62
26		7,200	450,250	77,148.00	17,132.01	94,280.01
27						
28	<b>TOTAL INDUSTRIALS</b>	<b>141,278</b>	<b>62,484,724</b>	<b>\$ 1,513,793.79</b>	<b>\$ 2,377,543.75</b>	<b>\$ 3,891,337.54</b>
29						
30	<b>GRAND TOTAL</b>	<b>610,447</b>	<b>265,668,854</b>	<b>\$ 7,990,671.84</b>	<b>\$ 11,520,829.60</b>	<b>\$ 19,511,501.44</b>

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

	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	<b>Member Billing August 2020</b>				
2					
3	\$ 6.00	\$ -	\$ -	\$ 26,809.57	\$ 391,501.08
4	-	-	-	48,376.63	705,721.00
5	-	-	-	18,278.50	260,030.74
6					
7	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 93,464.70</b>	<b>\$ 1,357,252.82</b>
8					
9	-	-	-	988.73	11,878.87
10	-	-	-	0.01	2.75
11	-	-	(118,161.81)	9,056.68	94,200.44
12	-	-	-	161.75	2,759.82
13	-	-	-	5,130.55	51,689.07
14	-	128.58	-	16.53	203.04
15	-	-	-	27.85	1,823.32
16	-	-	-	7.76	147.56
17	-	-	-	6,228.69	78,475.58
18	-	-	-	696.21	8,248.03
19	-	-	-	10.67	303.88
20	-	-	-	2,152.81	22,832.62
21	-	-	-	3,422.86	38,002.19
22	-	-	-	540.80	5,902.56
23	-	-	-	78.50	3,277.86
24	-	-	-	8.66	2,542.09
25	-	-	(86.10)	6.79	768.72
26	-	-	1,111.45	207.12	8,006.26
27					
28	<b>\$ -</b>	<b>\$ 128.58</b>	<b>\$ (117,136.46)</b>	<b>\$ 28,742.97</b>	<b>\$ 331,064.66</b>
29					
30	<b>\$ 6.00</b>	<b>\$ 128.58</b>	<b>\$ (117,136.46)</b>	<b>\$ 122,207.67</b>	<b>\$ 1,688,317.48</b>

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

1	Member Billing August 2020	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 139,759.44	\$ 5,064,664.28	\$ (148,570.63)	\$ 4,916,093.65
4	KENERGY	252,189.49	9,129,567.95	(268,088.86)	8,861,479.09
5	MEADE CO. RURALS	95,286.61	3,363,890.73	(101,293.99)	3,262,596.74
6					
7	<b>TOTAL RURALS</b>	<b>\$ 487,235.54</b>	<b>\$ 17,558,122.96</b>	<b>\$ (517,953.48)</b>	<b>\$ 17,040,169.48</b>
8					
9		\$ 5,154.28	\$ 153,671.09	\$ (4,679.22)	\$ 148,991.87
10		0.04	35.56	(0.03)	35.53
11		47,212.87	1,218,625.13	(42,861.34)	1,175,763.79
12		843.19	35,702.43	(765.48)	34,936.95
13		26,745.79	668,676.29	(24,280.68)	644,395.61
14		86.17	2,755.25	(78.23)	2,677.02
15		145.20	23,587.37	(131.81)	23,455.56
16		40.44	1,908.90	(36.71)	1,872.19
17		32,470.46	1,015,200.21	(29,477.71)	985,722.50
18		3,629.39	106,700.76	(3,294.88)	103,405.88
19		55.60	3,931.13	(50.47)	3,880.66
20		11,222.71	295,374.44	(10,188.33)	285,186.11
21		17,843.52	491,615.75	(16,198.92)	475,416.83
22		2,819.23	76,358.55	(2,559.39)	73,799.16
23		409.23	42,404.05	(371.51)	42,032.54
24		45.15	32,885.78	(40.99)	32,844.79
25		35.39	9,858.42	(32.13)	9,826.29
26		1,079.70	104,684.54	(980.18)	103,704.36
27					
28	<b>TOTAL INDUSTRIALS</b>	<b>\$ 149,838.36</b>	<b>\$ 4,283,975.65</b>	<b>\$ (136,028.01)</b>	<b>\$ 4,147,947.64</b>
29					
30	<b>GRAND TOTAL</b>	<b>\$ 637,073.90</b>	<b>\$ 21,842,098.61</b>	<b>\$ (653,981.49)</b>	<b>\$ 21,188,117.12</b>



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

1	Member Billing September 2020	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	120,548	47,871,490	1,664,165.14	\$ 2,154,217.05	\$ 3,818,382.19
4	KENERGY	220,841	88,266,122	3,048,710.01	3,971,975.49	7,020,685.50
5	MEADE CO. RURALS	80,117	32,780,560	1,106,015.19	1,475,125.20	2,581,140.39
6						
7	<b>TOTAL RURALS</b>	<b>421,506</b>	<b>168,918,172</b>	<b>\$ 5,818,890.34</b>	<b>\$ 7,601,317.74</b>	<b>\$ 13,420,208.08</b>
8						
9		4,937	2,173,906	52,899.96	\$ 82,717.12	\$ 135,617.08
10		3	17	32.15	0.65	32.80
11		40,800	19,262,468	437,172.00	732,936.91	1,170,108.91
12		1,890	409,753	20,251.35	15,591.10	35,842.45
13		15,000	10,790,318	160,725.00	410,571.60	571,296.60
14		63	27,227	675.05	1,035.99	1,711.04
15		1,800	52,176	19,287.00	1,985.30	21,272.30
16		100	15,219	1,071.50	579.08	1,650.58
17		35,165	22,130,472	376,792.98	842,064.46	1,218,857.44
18		3,372	1,577,679	36,130.98	60,030.69	96,161.67
19		250	21,603	2,678.75	821.99	3,500.74
20		7,484	4,494,344	80,191.06	171,009.79	251,200.85
21		13,077	7,600,866	140,120.06	289,212.95	429,333.01
22		2,249	1,220,359	24,098.04	46,434.66	70,532.70
23		3,000	157,953	32,145.00	6,010.11	38,155.11
24		2,760	20,718	29,573.40	788.32	30,361.72
25		800	8,752	8,572.00	333.01	8,905.01
26		7,200	606,656	77,148.00	23,083.26	100,231.26
27						
28	<b>TOTAL INDUSTRIALS</b>	<b>139,950</b>	<b>70,570,486</b>	<b>\$ 1,499,564.28</b>	<b>\$ 2,685,206.99</b>	<b>\$ 4,184,771.27</b>
29						
30	<b>GRAND TOTAL</b>	<b>561,456</b>	<b>239,488,658</b>	<b>\$ 7,318,454.62</b>	<b>\$ 10,286,524.73</b>	<b>\$ 17,604,979.35</b>

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

1	Member Billing September 2020	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (48,110.85)	\$ 286,952.81
4	KENERGY	-	-	-	(88,707.45)	527,619.46
5	MEADE CO. RURALS	-	-	-	(32,944.46)	193,994.73
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (169,762.76)</b>	<b>\$ 1,008,567.00</b>
8						
9		\$ -	\$ -	\$ -	\$ (2,184.78)	\$ 10,215.43
10		-	-		(0.02)	2.45
11		-	-	(118,161.81)	(19,358.78)	79,358.84
12		-	-	-	(411.80)	2,691.59
13		-	-	-	(10,844.27)	43,115.10
14		-	182.16	-	(27.36)	128.88
15		-	-	-	(52.44)	1,587.86
16		-	-	-	(15.30)	123.77
17		-	-	-	(22,241.12)	91,941.10
18		-	-	-	(1,585.57)	7,245.25
19		-	-	-	(21.71)	261.96
20		-	-	-	(4,516.82)	18,945.29
21		-	-	-	(7,638.87)	32,375.78
22		-	-	-	(1,226.46)	5,317.41
23		-	-	-	(158.74)	2,851.30
24		-	-	23.81	(20.82)	2,263.64
25		-	-	-	(8.80)	664.05
26		-	-	149.26	(609.69)	7,499.82
27						
28	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 182.16</b>	<b>\$ (117,988.74)</b>	<b>\$ (70,923.35)</b>	<b>\$ 306,589.52</b>
29						
30	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 182.16</b>	<b>\$ (117,988.74)</b>	<b>\$ (240,686.11)</b>	<b>\$ 1,315,156.52</b>

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

1	Member Billing September 2020	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 80,328.36	\$ 4,137,558.51	\$ (149,519.96)	\$ 3,988,038.55
4	KENERGY	148,110.55	7,607,708.06	(275,686.98)	7,332,021.08
5	MEADE CO. RURALS	55,005.78	2,797,196.44	(102,385.53)	2,694,810.91
6					
7	<b>TOTAL RURALS</b>	<b>\$ 283,444.69</b>	<b>\$ 14,542,463.01</b>	<b>\$ (527,592.47)</b>	<b>\$ 14,014,870.54</b>
8					
9		\$ 3,647.81	\$ 147,295.54	\$ (4,268.29)	\$ 143,027.25
10		0.03	35.26	(0.04)	35.22
11		32,322.42	1,144,269.58	(37,820.31)	1,106,449.27
12		687.57	38,809.81	(804.52)	38,005.29
13		18,106.15	621,673.58	(21,185.92)	600,487.66
14		45.69	2,040.41	(53.46)	1,986.95
15		87.55	22,895.27	(102.44)	22,792.83
16		25.54	1,784.59	(29.89)	1,754.70
17		37,134.93	1,325,692.35	(43,451.40)	1,282,240.95
18		2,647.35	104,468.70	(3,097.65)	101,371.05
19		36.25	3,777.24	(42.41)	3,734.83
20		7,541.51	273,170.83	(8,824.28)	264,346.55
21		12,754.25	466,824.17	(14,923.69)	451,900.48
22		2,047.76	76,671.41	(2,396.08)	74,275.33
23		265.05	41,112.72	(310.12)	40,802.60
24		34.76	32,663.11	(40.67)	32,622.44
25		14.69	9,574.95	(17.18)	9,557.77
26		1,017.97	108,288.62	(1,191.11)	107,097.51
27					
28	<b>TOTAL INDUSTRIALS</b>	<b>\$ 118,417.28</b>	<b>\$ 4,421,048.14</b>	<b>\$ (138,559.46)</b>	<b>\$ 4,282,488.68</b>
29					
30	<b>GRAND TOTAL</b>	<b>\$ 401,861.97</b>	<b>\$ 18,963,511.15</b>	<b>\$ (666,151.93)</b>	<b>\$ 18,297,359.22</b>

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

		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	Member Billing October 2020					
2						
3	JP RURALS	76,023	41,570,515	1,049,497.52	\$ 1,870,673.18	\$ 2,920,170.70
4	KENERGY	137,611	76,249,600	1,899,719.86	3,431,232.00	5,330,951.86
5	MEADE CO. RURALS	52,753	30,431,978	728,255.17	1,369,439.01	2,097,694.18
6						
7	<b>TOTAL RURALS</b>	<b>266,387</b>	<b>148,252,093</b>	<b>\$ 3,677,472.55</b>	<b>\$ 6,671,344.19</b>	<b>\$ 10,348,816.74</b>
8						
9		4,785	1,963,438	51,271.28	\$ 74,708.82	\$ 125,980.10
10		40,800	20,295,863	437,172.00	772,257.59	1,209,429.59
11		2,069	492,677	22,169.34	18,746.36	40,915.70
12		15,000	11,121,804	160,725.00	423,184.64	583,909.64
13		60	24,566	642.90	934.74	1,577.64
14		1,800	50,881	19,287.00	1,936.02	21,223.02
15		100	18,615	1,071.50	708.30	1,779.80
16		36,331	22,969,625	389,286.67	873,994.23	1,263,280.90
17		3,357	1,652,181	35,970.26	62,865.49	98,835.75
18		250	23,775	2,678.75	904.64	3,583.39
19		7,401	4,583,219	79,301.72	174,391.48	253,693.20
20		12,960	7,265,655	138,866.40	276,458.17	415,324.57
21		2,370	1,362,750	25,394.55	51,852.64	77,247.19
22		3,000	174,969	32,145.00	6,657.57	38,802.57
23		2,760	21,763	29,573.40	828.08	30,401.48
24		800	15,678	8,572.00	596.55	9,168.55
25		7,200	596,344	77,148.00	22,690.89	99,838.89
26						
27	<b>TOTAL INDUSTRIALS</b>	<b>141,043</b>	<b>72,633,803</b>	<b>\$ 1,511,275.77</b>	<b>\$ 2,763,716.21</b>	<b>\$ 4,274,991.98</b>
28						
29	<b>GRAND TOTAL</b>	<b>407,430</b>	<b>220,885,896</b>	<b>\$ 5,188,748.32</b>	<b>\$ 9,435,060.40</b>	<b>\$ 14,623,808.72</b>


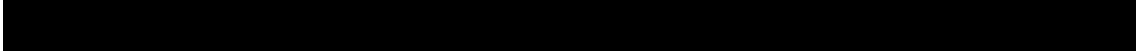
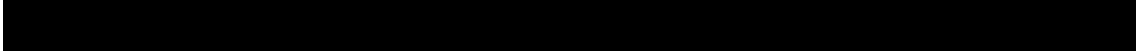
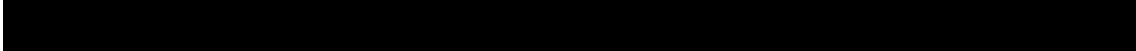
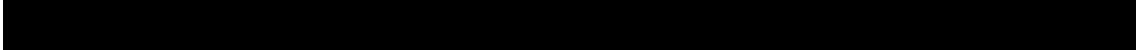



**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - October 2020**

1	Member Billing October 2020	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (78,194.14)	\$ 116,478.45
4	KENERGY	-	-	-	(143,425.50)	212,635.67
5	MEADE CO. RURALS	-	-	-	(57,242.55)	83,667.25
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (278,862.19)</b>	<b>\$ 412,781.37</b>
8						
9		\$ -	\$ -	\$ -	\$ (3,693.23)	\$ 5,023.66
10		-	-	(118,161.81)	(38,176.52)	43,489.33
11		-	-	-	(926.73)	1,632.76
12		-	-	-	(20,920.11)	23,267.91
13		-	150.01	-	(46.21)	62.91
14		-	-	-	(95.71)	848.57
15		-	-	-	(35.01)	71.05
16		-	-	-	(43,205.86)	50,348.69
17		-	-	-	(3,107.75)	3,940.32
18		-	-	-	(44.72)	143.15
19		-	-	-	(8,621.03)	10,111.31
20		-	-	-	(13,666.70)	16,555.29
21		-	-	-	(2,563.33)	3,079.06
22		-	-	-	(329.12)	1,550.80
23		-	-	48.00	(40.94)	1,215.98
24		-	-	-	(29.49)	366.64
25		-	-	1,408.60	(1,121.72)	3,989.03
26						
27	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 150.01</b>	<b>\$ (116,705.21)</b>	<b>\$ (136,624.18)</b>	<b>\$ 165,696.46</b>
28						
29	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 150.01</b>	<b>\$ (116,705.21)</b>	<b>\$ (415,486.37)</b>	<b>\$ 578,477.83</b>

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

1	Member Billing October 2020	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 69,755.32	\$ 3,028,216.33	\$ (144,679.28)	\$ 2,883,537.05
4	KENERGY	127,946.83	5,528,108.86	(265,374.08)	5,262,734.78
5	MEADE CO. RURALS	51,064.86	2,175,183.74	(105,913.45)	2,069,270.29
6					
7	<b>TOTAL RURALS</b>	<b>\$ 248,767.01</b>	<b>\$ 10,731,508.93</b>	<b>\$ (515,966.81)</b>	<b>\$ 10,215,542.12</b>
8					
9		\$ 3,294.65	\$ 130,605.18	\$ (3,663.01)	\$ 126,942.17
10		34,056.46	1,130,637.05	(37,864.10)	1,092,772.95
11		826.71	42,448.44	(919.15)	41,529.29
12		18,662.39	604,919.83	(20,748.91)	584,170.92
13		41.22	1,785.57	(5.82)	1,779.75
14		85.38	22,061.26	(94.92)	21,966.34
15		31.24	1,847.08	(34.73)	1,812.35
16		38,543.03	1,308,966.76	(42,852.29)	1,266,114.47
17		2,772.36	102,440.68	(3,082.32)	99,358.36
18		39.89	3,721.71	(44.35)	3,677.36
19		7,690.64	262,874.12	(8,550.48)	254,323.64
20		12,191.77	430,404.93	(13,554.86)	416,850.07
21		2,286.69	80,049.61	(2,542.36)	77,507.25
22		293.60	40,317.85	(326.42)	39,991.43
23		36.52	31,661.04	(40.60)	31,620.44
24		26.31	9,532.01	(29.24)	9,502.77
25		1,000.67	105,115.47	(1,112.54)	104,002.93
26					
27	<b>TOTAL INDUSTRIALS</b>	<b>\$ 121,879.53</b>	<b>\$ 4,309,388.59</b>	<b>\$ (135,466.10)</b>	<b>\$ 4,173,922.49</b>
28					
29	<b>GRAND TOTAL</b>	<b>\$ 370,646.54</b>	<b>\$ 15,040,897.52</b>	<b>\$ (651,432.91)</b>	<b>\$ 14,389,464.61</b>

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

1	May 2020 - Other Sales	MWH	REVENUE
2	<hr/>	<hr/>	<hr/>
3	SPECIAL SALES - ENERGY		
4		2,140	\$ 50,885.08
5	MISO	86,362	\$ 1,863,216.35
6			\$ 352,353.36
7			\$ 8,081.90
8			\$ 30,209.97
9			\$ 45,495.92
10		6,300.000	\$ 1,585,175.50
11		<hr/>	<hr/>
12	TOTAL SPECIAL SALES - ENERGY	94,802	\$ 3,935,418.08
13			
14	SPECIAL SALES - BILATERAL		
15			\$ (943,400.00)
16			\$ 1,044,100.00
17	MISO - CONTRA REVENUE		\$ (50,275.80)
18		<hr/>	<hr/>
19	TOTAL SPECIAL SALES - BILATERAL		\$ 50,424.20
20			

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

1	May 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	[REDACTED]		\$ 62,500.00
5	[REDACTED]		\$ 500.00
6	[REDACTED]		\$ 29,500.00
7	[REDACTED]		\$ 24,250.00
8	[REDACTED]		\$ 7,750.00
9	[REDACTED]		\$ 285,043.00
10	MISO - CAPACITY SALES		\$ (1,158.78)
11	[REDACTED]		\$ 318,500.00
12	[REDACTED]		\$ (18,932.50)
13			
14	TOTAL SPECIAL SALES - BILATERAL		\$ 707,951.72
15			
16	TOTAL	94,802	\$ 4,693,794.00



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

1	June 2020 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	6,316	\$ 147,729.35
5	[REDACTED]	372	\$ 19,317.96
6	MISO	105,066	\$ 2,647,738.14
7	[REDACTED]		\$ 463,377.95
8	[REDACTED]	77,008	\$ 2,916,109.51
9	[REDACTED]		\$ 124,680.84
10	[REDACTED]		\$ 90,154.91
11	[REDACTED]	20,600	\$ 1,947,477.00
12	<hr/>		
13	TOTAL SPECIAL SALES - ENERGY	209,362	\$ 8,356,585.66
14	<hr/>		
15	SPECIAL SALES - BILATERAL		
16	[REDACTED]		\$ (818,800.00)
17	[REDACTED]		\$ 906,200.00
18	[REDACTED]		\$ (1,510,200.00)
19	MISO - CONTRA REVENUE		\$ 1,618,736.92
20	<hr/>		
21	TOTAL SPECIAL SALES - BILATERAL		\$ 195,936.92
22	<hr/>		
23	SPECIAL SALES - CAPACITY		
24	MISO - CAPACITY SALES		\$ (1,415.10)
25	[REDACTED]		\$ 315,000.00
26	<hr/>		
27	TOTAL SPECIAL SALES - BILATERAL		\$ 313,584.90
28	<hr/>		
29	TOTAL	<u>209,362</u>	<u>\$ 8,866,107.48</u>

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

1	July 2020 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	21,317	\$ 655,170.94
5	[REDACTED]		\$ (10,650.36)
6	[REDACTED]		\$ 1,316.00
7	MISO	117,390	\$ 3,654,419.27
8	[REDACTED]		\$ 442,649.12
9	[REDACTED]	90,174	\$ 3,440,863.99
10	[REDACTED]		\$ 60,994.09
11	[REDACTED]		\$ 53,122.54
12	[REDACTED]	33,925	\$ 2,265,428.50
13		<hr/>	
14	TOTAL SPECIAL SALES - ENERGY	262,806	\$ 10,563,314.09
15			
16	SPECIAL SALES - BILATERAL		
17	[REDACTED]		\$ 925,900.00
18	[REDACTED]		\$ (836,600.00)
19	MISO - CONTRA REVENUE		\$ 24,925.03
20		<hr/>	
21	TOTAL SPECIAL SALES - BILATERAL		\$ 114,225.03
22			
23	SPECIAL SALES - CAPACITY		
24	MISO - CAPACITY SALES		\$ (1,462.27)
25	[REDACTED]		\$ 315,000.00
26		<hr/>	
27	TOTAL SPECIAL SALES - BILATERAL		\$ 313,537.73
28			
29	TOTAL	<u>262,806</u>	<u>\$ 10,991,076.85</u>

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

1	August 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	12,664	\$ 342,728.34
5	[REDACTED]		\$ (33,318.25)
6	MISO	149,098	\$ 4,147,090.67
7	[REDACTED]		\$ 504,359.87
8	[REDACTED]	81,132	\$ 2,960,369.35
9	[REDACTED]		\$ 92,344.62
10	[REDACTED]		\$ 70,302.62
11	[REDACTED]	27,675	\$ 2,117,707.25
12			
13	TOTAL SPECIAL SALES - ENERGY	270,569	\$ 10,201,584.47
14			
15	SPECIAL SALES - BILATERAL		
16	[REDACTED]		\$ 1,004,700.00
17	MISO - CONTRA REVENUE		\$ 6,190.05
18	[REDACTED]		\$ (907,800.00)
19			
20	TOTAL SPECIAL SALES - BILATERAL		\$ 103,090.05
21			
22	SPECIAL SALES - CAPACITY		
23	MISO - CAPACITY SALES		\$ (1,462.27)
24	[REDACTED]		\$ 315,000.00
25			
26	TOTAL SPECIAL SALES - BILATERAL		\$ 313,537.73
27			
28	TOTAL	<u>270,569</u>	<u>\$ 10,618,212.25</u>

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

1	September 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	15,342	\$ 327,265.06
5	[REDACTED]		\$ 52,847.35
6	MISO	49,865	\$ 1,224,613.09
7	[REDACTED]		\$ 597,640.04
8	[REDACTED]	71,631	\$ 2,583,701.55
9	[REDACTED]		\$ 121,163.46
10	[REDACTED]		\$ 84,307.09
11	[REDACTED]	15,275	\$ 1,809,058.50
12			
13	TOTAL SPECIAL SALES - ENERGY	152,113	\$ 6,800,596.14
14			
15	SPECIAL SALES - BILATERAL		
16	[REDACTED]		\$ 945,600.00
17	MISO - CONTRA REVENUE		\$ (8,886.69)
18	[REDACTED]		\$ (854,400.00)
19			
20	TOTAL SPECIAL SALES - BILATERAL		\$ 82,313.31
21			
22	SPECIAL SALES - CAPACITY		
23	MISO - CAPACITY SALES		\$ (1,415.10)
24	[REDACTED]		\$ 315,000.00
25			
26	TOTAL SPECIAL SALES - BILATERAL		\$ 313,584.90
27			
28	TOTAL	<u>152,113</u>	<u>\$ 7,196,494.35</u>

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

1	October 2020 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	5,959	\$ 168,847.65
5	[REDACTED]		\$ 3,810.00
6	MISO	140,677	\$ 4,193,845.05
7	[REDACTED]		\$ 336,970.57
8	[REDACTED]	56,609	\$ 407,536.48
9	[REDACTED]		\$ 51,850.38
10	[REDACTED]		\$ 39,142.48
11	[REDACTED]	26,775	\$ 2,088,565.25
12			
13	TOTAL SPECIAL SALES - ENERGY	230,020	\$ 7,290,567.86
14			
15	SPECIAL SALES - BILATERAL		
16	[REDACTED]		\$ 965,300.00
17	MISO - CONTRA REVENUE		\$ 1,918,590.48
18	[REDACTED]		\$ (872,200.00)
19			
20	TOTAL SPECIAL SALES - BILATERAL		\$ 2,011,690.48
21			
22	SPECIAL SALES - CAPACITY		
23	MISO - CAPACITY SALES		\$ (1,462.27)
24	[REDACTED]		\$ 315,000.00
25			
26	TOTAL SPECIAL SALES - BILATERAL		\$ 313,537.73
27			
28	TOTAL	230,020	\$ 9,615,796.07
29			

**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's Request for Information  
in Appendix B of the Commission's Order dated March 4, 2021**

**March 22, 2021**

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. 2021-00058**

**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, 2018 THROUGH OCTOBER 31, 2020**  
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**March 22, 2021**

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, 2018 THROUGH OCTOBER 31, 2020  
CASE NO. 2021-00058**

**Response to the Commission's Request for Information  
in Appendix B of the Commission's Order dated March 4, 2021**

**March 22, 2021**

1 **Item 15)** *Provide a list, in chronological order, showing by unit, any*  
2 *scheduled, actual, and forced outages between for the last six months of the*  
3 *period under review. Provide a key for any information that is abbreviated.*

4

5 **Response)** Please see the attached summary for the requested information  
6 regarding scheduled ("S"), actual ("A"), and forced ("F") outages. As noted in footnotes  
7 2 and 3 on page 5 of 5 of Big Rivers' response to Item 3, Big Rivers retired Reid Station  
8 Unit 1, and Coleman Station Units 1, 2, and 3, effective September 30, 2020.

9

10

11 **Witness)** Ronald D. Gregory

12



**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Reid Station Unit #1 - Coal - 65MW Net**  
 May 1 2020, through October 31 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				
May 2020		No Outages							
June 2020		No Outages							
July 2020		No Outages							
August 2020		No Outages							
September 2020		No Outages							
October 2020		No Outages							

Reid Unit #1 was idled on  
April 1, 2016.

Reid Unit 1 was retired on  
September 30, 2020.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net**  
 May 1 2020, through October 31 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				
May 2020		No Outages							
June 2020	F			6/10/2020 12:17	6/10/2020 13:11		0:54	0:54	A Starting Failure was declared when the Unit would not synchronize, due to a bus ground alarm.
July 2020	F			7/29/2020 11:23	7/29/2020 11:35		0:12	0:12	A Starting Failure was declared when the Unit would not synchronize, due to a bus ground alarm.
August 2020	S, A	8/27/2020 09:30	8/27/2020 19:00	8/27/2020 9:30	8/27/2020 19:00	9:30		9:30	The Unit was placed in MO (Maintenance Outage) status to repair an oil leak. The MO work was completed and the Unit was returned to RS (Reserve Standby) status.
September 2020	F			9/16/2020 16:00	9/17/2020 14:00		22:00	22:00	The Unit was removed from service, due to Air Compressor issues discovered during regular scheduled inspections, repairs were made and the Unit was returned to RS (Reserve Standby) status.
October 2020		No Outages							

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Green Station Unit #1 - Coal/Pet coke - 231MW Net**  
 May 1 2020, through October 31 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				
May 2020	F			5/5/2020 2:10	5/5/2020 3:19	1:09	1:09		Starting Failure (SF) declared due to exceeding the cold start limit during start-up
	F			5/26/2020 0:40	5/26/2020 2:10	1:30	1:30		Starting Failure (SF) declared due to exceeding the cold start limit during start-up
June 2020		No Outages							
July 2020	F			7/22/2020 13:58	7/22/2020 16:15	2:17	2:17		The Unit tripped, due to an event outside of the plant that caused a frequency variation and the Unit frequency compensators were unable to keep the Unit online.
August 2020	F			8/1/2020 0:29	8/2/2020 18:30	42:01	42:01		The Unit was removed from service, due to a Reheat Outlet boiler tube leak in the 4th tube back from the leading edge in the 24th bank from east.
	F			8/22/2020 15:53	8/23/2020 0:22	8:29	8:29		The Unit tripped offline, due to high furnace pressure when the (B) Induced Draft (ID) fan damper closed unexpectedly from the control arm locking nut backing off.
September 2020		No Outages							
October 2020	F			10/30/2020 3:12	10/31/2020 6:09	26:57	26:57		Unit taken offline, due to a Reheat Outlet boiler tube leak. Tube failure was the 3rd tube from leading edge in the 16th panel from the east wall @ elevation 598'.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Green Station Unit #2 - Coal/Pet coke - 223MW Net**  
 May 1 2020, through October 31 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				
May 2020		No Outages							
June 2020	F			6/4/2020 20:00	6/5/2020 1:30	5:30	5:30		(A) Air Heater Upper Guide bearing was found to be damaged during inspection for lube oil pump low pressure issues.
	F			6/5/2020 2:14	6/6/2020 22:48	44:34	44:34		(A) Air Heater Upper Guide Bushing failed due to low tolerance issues with the bushing installed. The bushing spun against the outer race, due to these tolerances.
	F			6/7/2020 16:45	6/8/2020 1:34	8:49	8:49		Starting Failure (SF) was declared, due to exceeding the 16 hour start time after not being able to line up a pulverizer for unit tie on. The 2B and 2D Pulverizers were found to have pluggage in the throat ring from wet fuel.
	F			6/8/2020 6:06	6/8/2020 16:00	9:54	9:54		Boiler upset due to 2B pulverizer resulted in low boiler O2 causing the control room operator (CRO) to trip the unit.
	S, A	6/25/2020 07:00	6/27/2020 18:00	6/25/2020 7:00	6/27/2020 18:00	59:00	59:00		While the Unit was offline, due to economics, the Unit was placed in MO (Maintenance Outage) to a repair a water wall tube leak. The tube failure was the 25th tube on the south wall counting from the west corner of the boiler at elevation 510ft. The maintenance outage work was completed and the unit was returned to RS (Reserve Standby) status.
July 2020		No Outages							
August 2020		No Outages							

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Green Station Unit #2 - Coal/Pet coke - 223MW Net**  
 May 1 2020, through October 31 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				
September 2020	F			9/23/2020 3:50	9/26/2020 21:00	89:10		89:10	The Unit was removed from service, due to a Secondary Super-Heat (SSH) boiler tube failure of the 11th tube from the leading edge in the 21st panel from the east @ elevation 600ft.
October 2020		No Outages							

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Coleman Station Unit #1 - Coal - 150MW Net**  
 May 1 2020, through October 31 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				
May 2020		No Outages							
June 2020		No Outages							
July 2020		No Outages							
August 2020		No Outages							
September 2020		No Outages							
October 2020		No Outages							

Coleman Unit #1 was idled on  
May 1, 2014.

Coleman Unit #1 was retired on  
September 30, 2020

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Coleman Station Unit #2 - Coal - 138MW Net**  
 May 1 2020, through October 31 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				
May 2020		No Outages							
June 2020		No Outages							
July 2020		No Outages							
August 2020		No Outages							
September 2020		No Outages							
October 2020		No Outages							

Coleman Unit #2 was idled on  
May 1, 2014.

Coleman Unit #2 was retired on  
September 30, 2020.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Coleman Station Unit #3 - Coal - 155MW Net**  
 May 1 2020, through October 31 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				
May 2020		No Outages							
June 2020		No Outages							
July 2020		No Outages							
August 2020		No Outages							
September 2020		No Outages							
October 2020		No Outages							

Coleman Unit #3 was idled on  
May 8, 2014.

Coleman Unit #3 was retired on  
September 30, 2020.



**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2020, through October 31 2020**

Big Rivers Electric Corporation  
**Wilson Station - Unit #1 - Coal/Pet Coke - 417MW Net**  
 May 1 2020, through October 31 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				
May 2020	F			5/19/2020 13:00	5/19/2020 21:24		8:24	8:24	Control System signal from two generator Resistance Temperature Detectors (RTD) went to bad quality and caused a Unit trip.
	F			5/25/2020 19:07	5/26/2020 1:51				The Auxillary Boiler Feed Pump (BFP) recirculation valve failed to operate in automatic and would not operate in manual from the control room. The BFP recirculation valve issue resulted in a Unit trip, due to drum water level.
June 2020		No Outages							
July 2020	S, A	7/3/2020 00:00	7/6/2020 00:00	7/3/2020 0:00	7/5/2020 22:37	72:00		70:37	The Unit was removed from service and placed in MO (Maintenance Outage) status to repair a boiler tube leak in the Reheater Section of the boiler.
August 2020		No Outages							
September 2020		No Outages							
October 2020	F			10/19/2020 1:04	10/19/2020 5:37		4:33	4:33	Unit tripped, due to loss of #2 Boiler Feed Pump (BFP) lube oil pressure when the lube oil pump drive coupling broke.
	F			10/19/2020 9:41	10/19/2020 12:13		2:32	2:32	Unit tripped on low drum level, due to a #2 Boiler Feed Pump (BFP) trip for vibration.
	F			10/19/2020 21:29	10/20/2020 5:08		7:39	7:39	Unit tripped on low drum level, due to #1 Induced Draft (ID) fan trip caused by the relief valve failure on the lube oil system.
	F			10/23/2020 17:20	10/24/2020 1:24		8:04	8:04	Unit was removed from service, due to an EH (Electro Hydraulic) control system leak on #2 Governor Valve when an o-ring failed.

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**Response to the Commission's Request for Information  
in Appendix B of the Commission's Order dated March 4, 2021**

**March 22, 2021**

1 Item 16) *For the last six months of the period under review, provide the*  
2 *monthly capacity factor 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**

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**March 22, 2021**

1

Big Rivers Electric Corporation Monthly Capacity Factor by Generating Unit							
Generating Unit	Metric <sup>a</sup>	May 2020	June 2020	July 2020	Aug. 2020	Sept. 2020	Oct. 2020
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	Retired in NERC GADS <sup>d</sup> on December 1, 2019					
	NCF						
Reid Station Unit # 2 CT	GCF	0.0%	0.7%	1.7%	0.6%	0.0%	0.7%
	NCF	-0.2%	0.6%	1.7%	0.4%	-0.2%	0.5%
Green Station Unit # 1	GCF	13.7%	55.4%	64.6%	58.8%	44.6%	34.1%
	NCF	12.3%	52.1%	61.5%	55.7%	41.7%	32.4%
Green Station Unit # 2	GCF	0.0%	38.5%	64.0%	62.0%	5.4%	31.5%
	NCF	-0.9%	36.1%	61.5%	59.4%	4.2%	30.3%
Wilson Station Unit # 1	GCF	57.5%	71.9%	72.0%	81.6%	75.0%	80.3%
	NCF	56.9%	71.2%	71.2%	81.2%	74.5%	79.9%
Coleman Station Unit # 1 <sup>c</sup>	GCF	0.0%	0.0%	0.0%	0.0%	0.0%	Not Applicable
	NCF	-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%	
	NCF	-0.1%	-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%	
	NCF	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%	

2

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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. Big Rivers retired Reid Station Unit 1 effective September 30, 2020.
- 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. Big Rivers retired Coleman Station Units 1, 2, and 3 effective September 30, 2020.
- d.-** NERC GADS = North American Electric Reliability Corporation Generating Availability Data System

2

3

4 **Witness)** Jason C. Burden

5

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1 **Item 17)**

- 2       **a. For the last six months of the period under review, explain whether**  
3       **BREC made any changes to its maintenance and operation**  
4       **practices or completed any specific generation efficiency**  
5       **improvements that affect fuel usage at BREC's generation facilities.**
- 6       **b. Describe the impact of these changes on BREC's fuel usage.**

7

8 **Response)**

- 9       a. For the last six months of the period under review, *i.e.*, May 1, 2020,  
10       through October 31, 2020, Big Rivers has not made any changes to its  
11       maintenance and operation practices, or completed any specific generation  
12       efficiency improvements that affect fuel usage at Big Rivers' generation  
13       facilities.
- 14       b. Not Applicable.

15

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

17       Jason C. Burden (*b. only*)

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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 *last six months of the 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 last six months of the period  
7 under review, *i.e.*, May 1, 2020, through October 31, 2020. Big Rivers is also unaware  
8 of any unreported violation prior to the current period under review.

9

10

11 **Witness)** Mark W. McAdams

12

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1 **Item 19)**     *State whether BREC is aware of any violations of 807 KAR 5:056*  
2 *that occurred prior to or during the last six months of the period under*  
3 *review.*

4

5 **Response)**   Big Rivers is unaware of any violations of 807 KAR 5:056 that occurred  
6 prior to or during the last six months of the period under review, *i.e.*, May 1, 2020,  
7 through October 31, 2020.

8

9

10 **Witness)**    Jennifer M. Stone

11

**BIG RIVERS ELECTRIC CORPORATION**

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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



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1 **Item 21)** *For each generating station, state the methods of coal delivery*  
2 *currently available.*

3

4 **Response)** The currently available methods for coal deliveries to Big Rivers  
5 generating stations is shown below. Station Two is not shown since it was retired  
6 February 1, 2019. Coleman Station and Reid Station are not shown since they were  
7 retired on September 30, 2020.

8

	<b>Rail</b>	<b>Truck</b>	<b>Barge</b>
<b>Green</b>	Not Available	Available	Available
<b>Wilson</b>	Not Available	Available	Available

9

10

11 **Witness)** Mark W. McAdams

12

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1 Item 22) *If a change in the base fuel cost is proposed, state the month to*  
2 *be used as the base period (b). If the base period results in a fuel cost other*  
3 *than one representative of current costs as prescribed by 807 KAR 5:056,*  
4 *Section 1(2), explain why this base period was selected. If no change is*  
5 *proposed, include an explanation of the reason(s) BREC believes the current*  
6 *base period fuel cost should remain unchanged.*

7

8 **Response)** Big Rivers is proposing, and recommends the Commission approve, no  
9 change in Big Rivers' base fuel cost and that it, therefore, remain unchanged at  
10 \$0.020932 per kWh. Big Rivers believes the history of its monthly Fuel Adjustment  
11 Clause ("FAC") factor during the period under review, and Big Rivers' projections of  
12 its monthly FAC factor for 2021 and 2022, support this position. Big Rivers' Member-  
13 Owners have concurred with this position when presented the aforementioned  
14 historical and forecasted information. Also, Big Rivers' current portfolio of fuel  
15 contracts, and anticipated changes to that portfolio support this position. Finally,  
16 Big Rivers believes this position is consistent with the standard which the  
17 Commission has applied to Big Rivers' prior two-year FAC reviews.

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1           Big Rivers reviewed its historical, monthly FAC performance for the last  
2 period under review, *i.e.*, from November 1, 2018 through October 31, 2020. Big  
3 Rivers also reviewed its forecasted monthly FAC factor for 2021 and 2022. These  
4 reviews are comparable to Big Rivers’ analysis in its prior two-year FAC Reviews –  
5 Case No. 2010-00495,<sup>2</sup> Case No. 2012-00555,<sup>3</sup> Case No. 2014-00455,<sup>4</sup> Case No. 2017-  
6 00006,<sup>5</sup> and Case No. 2019-00007.<sup>6</sup> Attachment 1 to this response shows the  
7 performance of Big Rivers’ FAC factor for the twenty-four (24) months of the two-year  
8 period under review. **CONFIDENTIAL** Attachment 2 shows Big Rivers’ forecasted  
9 monthly FAC factor for 2021 and 2022.

10

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<sup>2</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from July 17, 2009 through October 31, 2010*, Case No. 2010-00495.

<sup>3</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2010 through October 31, 2012*. Case No. 2012-00555.

<sup>4</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2012 through October 31, 2014*. Case No. 2014-00455.

<sup>5</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2014 through October 31, 2016*. Case No. 2017-00006.

<sup>6</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2016 through October 31, 2018*. Case No. 2019-00007.

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1 As Attachment 1 shows, the twenty-four (24) month historical average for Big  
2 Rivers’ FAC factor is (\$0.000010), negative one thousandth of a penny.  
3 **CONFIDENTIAL** Attachment 2, filed with a Motion for Confidential Treatment,  
4 shows that the *projected* twenty-four month average for Big Rivers’ FAC factor for  
5 the expense months in 2021 and 2022 is [REDACTED], and these *projected* monthly FAC  
6 factors range from [REDACTED] in the [REDACTED] expense month to [REDACTED] in  
7 the [REDACTED] expense month.

8 The forecasted [REDACTED] expense month is driven by Big Rivers’ [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]. Big Rivers’ [REDACTED]  
12 [REDACTED]  
13 [REDACTED]. Past the [REDACTED]  
14 expense month, as shown in **CONFIDENTIAL** Attachment 2, the monthly FAC  
15 factors [REDACTED].

16 Adjusting the *projected* FAC factor by excluding the [REDACTED] expense month  
17 from the analysis due to the unique factors driving it, the *adjusted, projected* monthly

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1 FAC factors range from [REDACTED] to [REDACTED] and the *adjusted, projected* twenty-  
2 four month average for Big Rivers’ FAC factor for the expense months in 2021 and  
3 2022 [REDACTED] from [REDACTED] to [REDACTED]. Big Rivers believes these values – a  
4 twenty-four (24) month historical average FAC factor of (\$0.000010) and the  
5 *adjusted, projected* twenty-four month average FAC factor, of [REDACTED] – clearly  
6 support no change in its current base fuel cost of \$0.020932 per kWh.

7 As a Member-Owned generation and transmission cooperative, Big Rivers  
8 consulted with its Member-Owners<sup>7</sup> about a possible change in Big Rivers’ current  
9 base fuel cost. Big Rivers informed its Member-Owners that it did not anticipate  
10 changing the current base fuel cost given the currently available information. After  
11 reviewing the information describe earlier, all three Member-Owners concurred with  
12 Big Rivers’ position to not change its base fuel cost. Any change in Big Rivers’  
13 current base fuel cost would impact its Member-Owners’ tariffs and their respective  
14 billing systems. Following the Member-Owners’ issuance of notices to their  
15 respective retail members, and the retail members’ receiving their initial monthly

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<sup>7</sup> Big Rivers’ Member-Owners are Jackson Purchase Energy Corporation, Kenergy Corp., and Meade County Rural Electric Cooperative Corporation.

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1 billings reflecting any changes, in-person, e-mail, and phone inquiries from the  
2 Member-Owners' retail members will increase.

3       Also, Big Rivers has entered into a series of coal supply agreements which Big  
4 Rivers believes provide price hedges over the term of these agreements. At this time,  
5 based upon bids received, contracts secured, and market indices, it does not appear  
6 that coal pricing will escalate dramatically over the next two years, with the  
7 exception of the anomalous [REDACTED] expense month explained above, and as shown  
8 in **CONFIDENTIAL** Attachment 2.

9       Finally, in its orders approving no change to Big Rivers' base fuel costs in two  
10 of Big Rivers' prior two-year FAC reviews,<sup>8,9</sup> the Commission noted:

11  
12       *In establishing the appropriate level of base fuel cost to be included in*  
13       *Big Rivers' rates, the Commission must determine whether the proposed*  
14       *base period cost per kWh is representative of the level of fuel cost currently*  
15       *being experienced by Big Rivers.<sup>10,11</sup>*

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<sup>8</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2014 through October 31, 2016* – Case No. 2017-00006.

<sup>9</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2012 through October 31, 2014* – Case No. 2014-00455.

<sup>10</sup> See Commission Order dated July 31, 2017, in Case No. 2017-00006 at page 2.

<sup>11</sup> See Commission Order dated July 27, 2015, in Case No. 2014-00455 at page 3.

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1 Similarly, in its most recent two-year review of Big Rivers' FAC,<sup>12</sup> the Commission  
2 stated:

3  
4 *The Commission must determine whether the proposed base period cost*  
5 *per kWh is representative of the level of fuel cost currently being*  
6 *experienced by BREC when establishing the appropriate level of base fuel*  
7 *cost to be included in BREC's rates.<sup>13</sup>*  
8

9 Based on the information presented in Attachment 1 and **CONFIDENTIAL**  
10 Attachment 2, Big Rivers believes its current base fuel cost is representative of what  
11 it has experienced in the last twenty-four months, and expects to experience in 2021  
12 and 2022, especially considering the magnitude of the most recent and projected FAC  
13 factors *versus* the operational difficulties required for Big Rivers, and particularly for  
14 its Member-Owners, to implement a base fuel cost change. As noted above, any  
15 change in Big Rivers' base fuel would require Big Rivers and its Member-Owners to  
16 update their respective tariffs on file with the Commission and make changes to their

---

<sup>12</sup> See *In the Matter of: An Examination of the Application of the Fuel Adjustment Clause of Big Rivers Electric Corporation from November 1, 2016 through October 31, 2018* – Case No. 2019-00007.

<sup>13</sup> See Commission Order dated December 26, 2019, in Case No. 2019-00007 at page 2

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1 respective billing systems. Any Member-Owner notices to their respective retail  
2 members will most likely generate numerous in-person, e-mail, and phone inquiries.

3

4

5 **Witnesses)** Roger D. Hickman and

6                   Mark W. McAdams

7



**Big Rivers Electric Corporation**  
**Summary of Fuel Adjustment Clause Calculation Components**  
**November 1, 2018 through October 31, 2020**

(a)	(b)	(c)	(d) = (g) / (h)	(e) = (c) - (d)	(f)	(g)	(h)
Expense Month	Billing Month	Base Fuel Cost per kWh <sup>1</sup>	Total Fuel Cost per kWh	FAC Factor	Over/(Under) Recovery <sup>2</sup>	Fuel Cost \$ Schedule ("Fm") <sup>3</sup>	Sales(kWhs) Schedule ("Sm") <sup>4</sup>
Nov 2018	Jan 2019	\$0.020932	\$0.021156	\$0.000224	\$51,995.00	5,680,442	268,504,658
Dec 2018	Feb 2019	\$0.020932	\$0.022490	\$0.001558	\$3,608.00	6,401,042	284,611,169
Jan 2019	Mar 2019	\$0.020932	\$0.021259	\$0.000327	\$39,145.00	6,584,544	309,736,436
Feb 2019	Apr 2019	\$0.020932	\$0.021462	\$0.000530	(\$16,968.00)	5,533,833	257,848,432
Mar 2019	May 2019	\$0.020932	\$0.020866	(\$0.000066)	\$5,531.00	5,598,024	268,285,675
Apr 2019	Jun 2019	\$0.020932	\$0.022454	\$0.001522	\$3,303.00	4,900,478	218,249,664
May 2019	Jul 2019	\$0.020932	\$0.021056	\$0.000124	\$40,089.00	5,150,140	244,589,676
Jun 2019	Aug 2019	\$0.020932	\$0.020159	(\$0.000773)	\$2,121.00	5,275,440	261,693,255
Jul 2019	Sep 2019	\$0.020932	\$0.021441	\$0.000509	(\$33,597.00)	6,542,928	305,156,371
Aug 2019	Oct 2019	\$0.020932	\$0.021987	\$0.001055	(\$4,880.00)	6,498,795	295,570,494
Sep 2019	Nov 2019	\$0.020932	\$0.022243	\$0.001311	(\$15,626.00)	6,245,061	280,759,047
Oct 2019	Dec 2019	\$0.020932	\$0.023611	\$0.002679	(\$68,060.00)	5,403,330	228,844,685
<b>Twelve-Month Average</b>		\$0.020932	\$0.021682	\$0.000750	\$555.08	5,817,838	268,654,130
Nov 2019	Jan 2020	\$0.020932	\$0.022778	\$0.001846	\$91,216	5,988,082	262,893,206
Dec 2019	Feb 2020	\$0.020932	\$0.021325	\$0.000393	\$19,603	5,832,612	273,512,591
Jan 2020	Mar 2020	\$0.020932	\$0.020997	\$0.000065	\$4,368	5,976,371	284,626,649
Feb 2020	Apr 2020	\$0.020932	\$0.020450	(\$0.000482)	(\$1,206)	5,441,437	266,083,991
Mar 2020	May 2020	\$0.020932	\$0.019637	(\$0.001295)	\$15,493	4,593,887	233,940,269
Apr 2020	Jun 2020	\$0.020932	\$0.017802	(\$0.003130)	\$43,291	3,569,590	200,511,255
May 2020	Jul 2020	\$0.020932	\$0.019260	(\$0.001672)	(\$29,895)	4,045,783	210,062,156
Jun 2020	Aug 2020	\$0.020932	\$0.019194	(\$0.001738)	(\$84,171)	4,998,071	260,403,580
Jul 2020	Sep 2020	\$0.020932	\$0.021392	\$0.000460	(\$67,497)	6,401,192	299,239,474
Aug 2020	Oct 2020	\$0.020932	\$0.019927	(\$0.001005)	(\$15,442)	5,293,953	265,668,854
Sep 2020	Nov 2020	\$0.020932	\$0.019051	(\$0.001881)	\$26,311	4,562,458	239,488,658
Oct 2020	Dec 2020	\$0.020932	\$0.020133	(\$0.000799)	\$34,992	4,447,200	220,885,896
<b>Twelve-Month Average</b>		\$0.020932	\$0.020162	(\$0.000770)	\$3,089	5,095,886	251,443,048
<b>24-Month Average</b>		\$0.020932	\$0.020922	(\$0.000010)	\$1,822	5,456,862	260,048,589

- Note(s):**
- 1.- See Big Rivers' Monthly Form A filings, page 1 of 2.
  - 2.- See Big Rivers' Monthly Form A filings, page 2 of 4 and page 4 of 4.
  - 3.- See Big Rivers' Monthly Form A filings, page 1 of 2 and page 2 of 4.
  - 4.- See Big Rivers' Monthly Form A filings, page 1 of 2 and page 3 of 4.

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**Attachment 1 for Response to PSC 1-22**

**Witnesses: Roger D. Hickman and Mark W. McAdams**

**Big Rivers Electric Corporation**  
**Summary of Fuel Adjustment Clause Calculation Components**  
***Forecasted Expense Months* January 2021 through December 2022**

(a)	(b)	(c)	(d) = (f) / (g)	(e) = (c) - (d)	(f)	(g)
Expense Month	Billing Month	Base Fuel Cost per kWh <sup>1</sup>	Total Fuel Cost per kWh	FAC Factor	Fuel Cost \$ Schedule ("Fm")	Sales(kWhs) Schedule ("Sm")
Jan 2021	Mar 2021	\$0.020932				
Feb 2021	Apr 2021	\$0.020932				
Mar 2021	May 2021	\$0.020932				
Apr 2021	Jun 2021	\$0.020932				
May 2021	Jul 2021	\$0.020932				
Jun 2021	Aug 2021	\$0.020932				
Jul 2021	Sep 2021	\$0.020932				
Aug 2021	Oct 2021	\$0.020932				
Sep 2021	Nov 2021	\$0.020932				
Oct 2021	Dec 2021	\$0.020932				
Nov 2021	Jan 2022	\$0.020932				
Dec 2021	Feb 2022	\$0.020932				
<b>Twelve-Month Average</b>		\$0.020932				
Jan 2022	Mar 2022	\$0.020932				
Feb 2022	Apr 2022	\$0.020932				
Mar 2022	May 2022	\$0.020932				
Apr 2022	Jun 2022	\$0.020932				
May 2022	Jul 2022	\$0.020932				
Jun 2022	Aug 2022	\$0.020932				
Jul 2022	Sep 2022	\$0.020932				
Aug 2022	Oct 2022	\$0.020932				
Sep 2022	Nov 2022	\$0.020932				
Oct 2022	Dec 2022	\$0.020932				
Nov 2022	Jan 2023	\$0.020932				
Dec 2022	Feb 2023	\$0.020932				
<b>Twelve-Month Average</b>		\$0.020932				
<b>24-Month Average</b>		\$0.020932				

Note(s): 1.- See Big Rivers' Monthly Form A filings, page 1 of 2.

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1 **Item 23)** *Provide a calculation of the fossil fuel costs  $F(b)$  that BREC*  
2 *proposes to use to calculate the base period fuel cost. This calculation shall*  
3 *show each component of  $F(b)$  as defined by 807 KAR 5:056. Explain why the*  
4 *fuel cost in the selected base period is representative of the level of fuel cost*  
5 *currently being experienced by BREC.*

6

7 **Response)** Please see Big Rivers' response to Item 22. As Big Rivers is proposing  
8 no change to its current base fuel cost of \$0.020932 per kWh, Big Rivers considers  
9 this information request not applicable.

10

11

12 **Witness)** Roger D. Hickman

13

**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's Request for Information  
in Appendix B of the Commission's Order dated March 4, 2021**

**March 22, 2021**

1 **Item 24)** *Provide a schedule showing each component of sales as defined*  
2 *by 807 KAR 5:056 in the selected base period (b). Explain why BREC believes*  
3 *that the sales in the selected base period (b) are representative of the level*  
4 *of kWh sales that BREC will derive from the level of fuel cost incurred*  
5 *during the selected base period (b).*

6 *a. Separately provide the amounts of power purchases used in the*  
7 *calculation of sales provided.*

8 *b. Separately provide the amounts of intersystem power sales used in*  
9 *the calculation of sales provided.*

10

11 **Response)** Please see Big Rivers' response to Item 22. As Big Rivers is proposing  
12 no change to its current base fuel cost of \$0.020932 per kWh, Big Rivers considers  
13 this information request not applicable.

14

15

16 **Witness)** Roger D. Hickman

17

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**March 22, 2021**

1 **Item 25)** *Provide a schedule showing the calculation of BREC's proposed*  
2 *increase or decrease in its base fuel cost per kWh to be incorporated into its*  
3 *base rate.*

4

5 **Response)** Please see Big Rivers' response to Item 22. As Big Rivers is proposing  
6 no change to its current base fuel cost of \$0.020932 per kWh, Big Rivers considers  
7 this information request not applicable.

8

9

10 **Witness)** Roger D. Hickman

11

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**March 22, 2021**

1 **Item 26)** *Provide a schedule of the present and proposed rates that BREC*  
2 *seeks to change pursuant to 807 KAR 5:056, shown in comparative form.*

3

4 **Response)** Please see Big Rivers' response to Item 23. As Big Rivers is proposing  
5 no change to its current base fuel cost of \$0.020932 per kWh, Big Rivers considers  
6 this information request not applicable.

7

8

9 **Witness)** Roger D. Hickman

10

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**March 22, 2021**

1 **Item 27)** *Provide a copy of the current tariff showing by cross-outs and*  
2 *inserts all proposed changes in rates.*

3

4 **Response)** Please see Big Rivers' response to Item 23. As Big Rivers is proposing  
5 no change to its current base fuel cost of \$0.020932 per kWh, Big Rivers considers  
6 this information request not applicable.

7

8

9 **Witness)** Roger D. Hickman

10

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**March 22, 2021**

1 **Item 28)**     *For the years ending October 31, 2019, and October 31, 2020,*

2 *provide:*

3       *a. Maximum annual system demand; and*

4       *b. Average annual demand.*

5

6 **Response)**

7       a. November 1, 2018 through October 31, 2019 – 702 MW;

8             November 1, 2019 through October 31, 2020 – 566 MW.

9       b. November 1, 2018 through October 31, 2019 – 385 MW;

10            November 1, 2019 through October 31, 2020 – 344 MW.

11 The figures above include only Big Rivers' native load and do not include other

12 transmission customers.

13

14

15 **Witness)**     Natalie R. Hankins

16



**BIG RIVERS ELECTRIC CORPORATION**

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**March 22, 2021**

1 **Item 29)**

2 *a. Provide a schedule of the calculation of the 12-month average line*  
3 *loss by month for November 2018 through October 2020.*

4 *b. Describe the actions that BREC has taken to reduce line loss during*  
5 *this period.*

6

7 **Response)**

8 a. Please see the table attached to this response for calculations of the 12-  
9 month average line losses for November 2018 through October 2020.

10 b. Big Rivers continues to design and operate its transmission system in the  
11 most efficient manner possible. No specific actions with the potential to  
12 further reduce line losses were identified or implemented during the period  
13 from November 2018 through October 2020.

14

15

16 **Witnesses)** Jennifer M. Stone (*a. only*) and

17 Christopher S. Bradley (*b. only*)

**Case No. 2021-00058  
Response to PSC 1-29**

**Witnesses: Jennifer M. Stone (*a. only*) and  
Christopher S. Bradley (*b. only*)**

**Page 1 of 1**

**Big Rivers Electric Corporation**  
**Case No. 2021-00058**  
**12 Month Average Line Loss Calculation**  
**November 2018 - October 2020**

Line No.	(a)	(b)	(c)	(d)
	12 Months Ended	12 Month Total kWh Sources	12 Month Total kWh Line Losses	12 Month Line Losses as a Percent of Total Sources
				(c) / (b)
1	Nov-18	6,850,516,643	156,591,128	2.29%
2	Dec-18	6,564,511,627	142,056,852	2.16%
3	Jan-19	6,481,243,318	149,505,698	2.31%
4	Feb-19	6,620,790,137	160,026,991	2.42%
5	Mar-19	6,629,234,000	160,819,950	2.43%
6	Apr-19	6,487,701,639	151,160,767	2.33%
7	May-19	6,444,119,330	151,058,339	2.34%
8	Jun-19	6,374,492,419	154,570,733	2.42%
9	Jul-19	6,381,538,197	156,166,424	2.45%
10	Aug-19	6,223,641,567	157,371,086	2.53%
11	Sep-19	6,148,790,317	164,180,044	2.67%
12	Oct-19	6,121,821,618	158,518,487	2.59%
13	Nov-19	6,244,810,804	152,146,516	2.44%
14	Dec-19	6,253,530,118	162,725,876	2.60%
15	Jan-20	6,093,916,745	163,437,826	2.68%
16	Feb-20	5,884,264,719	151,437,088	2.57%
17	Mar-20	5,597,557,738	142,008,614	2.54%
18	Apr-20	5,406,179,956	144,883,088	2.68%
19	May-20	5,131,760,955	132,820,184	2.59%
20	Jun-20	5,032,236,141	119,185,812	2.37%
21	Jul-20	5,011,668,795	113,728,296	2.27%
22	Aug-20	5,068,484,268	119,273,904	2.35%
23	Sep-20	4,975,604,451	112,295,306	2.26%
24	Oct-20	5,055,707,640	116,860,481	2.31%

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**March 22, 2021**

1 **Item 30)** *Provide the most recent projected fuel requirements for the years*  
2 *2021 and 2022 in tons for coal, MMBtu for natural gas, and dollars.*

3

4 **Response)** Please see the schedule below.

5

	<u>2021</u>	<u>2022</u>
Coal (tons)		
Natural Gas (MCF)		
Fuel Oil (Gallons)		
	<u>2021</u>	<u>2022</u>
Coal		
Natural Gas		
Fuel Oil		
Total		

6

7

8 **Witness)** Mark W. McAdams

9

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**March 22, 2021**

1 **Item 31)** *Provide the most recent sales projections for the years 2021 and*  
2 *2022 in kWh and dollars.*

3

4 **Response)** Sales projections for the years 2021 and 2022 are provided in the table  
5 below.

6

<b>Year</b>	<b>Member Cooperative Energy (kWhs)</b>	<b>Member Cooperative Sales (\$)</b>	<b>Off-System Sales (kWhs)</b>	<b>Off-System Sales (\$)</b>
2021	3,211,980,000	\$234,566,508		
2022	3,191,638,000	\$241,348,506		

7

8

9 **Witness)** Natalie R. Hankins

10

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**March 22, 2021**

1 **Item 32)** *Provide the planned maintenance schedule for each of the*  
 2 *generating units for the years 2021 and 2022.*

3

4 **Response)** Please see the redacted schedules below for the planned maintenance  
 5 schedule for Big Rivers’ generating units for the years 2021 and 2022

6

2021 Outage Schedule				
Start	End	Hours	Days	Unit/Outage
[Redacted]				
Total				

7

2022 Outage Schedule				
Start	End	Hours	Days	Unit/Outage
[Redacted]				
Total				

8

9

10 **Witness)** Ronald D. Gregory

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**March 22, 2021**

1 **Item 33)** *Identify any issues that could affect fuel costs for the two-year*  
2 *period that remain unresolved or unsettled. Include in the response any*  
3 *issues related to billings from a regional transmission operator. Consider*  
4 *this a continuing request to inform the Commission if BREC becomes aware*  
5 *of any issues during the course of this proceeding.*

6

7 **Response)** There are no unresolved or unsettled issues for the two-year period that  
8 could affect fuel costs, including issues related to billing from the Midcontinent  
9 Independent System Operator, Inc. (“MISO”).

10

11

12 **Witnesses)** Mark W. McAdams and

13                   Natalie R. Hankins (*MISO billing only*)

14

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**March 22, 2021**

1 **Item 34) *Provide the number of BREC's coal purchase contracts that***  
2 ***included transportation costs and those that did not from November 1, 2018,***  
3 ***through October 31, 2020.***

4 ***a. Explain how it is determined whether transportation costs will be***  
5 ***included in the coal purchase contract.***

6 ***b. When transportation is contracted for separately from the coal***  
7 ***contract, explain whether BREC issues requests for proposals (RFP)***  
8 ***for this service.***

9 ***(1) If yes, state how often this occurs, how many vendors are***  
10 ***included in the RFP, and how is it determined which vendors***  
11 ***will receive the RFP.***

12 ***(2) State whether BREC uses or contracts with any related parties***  
13 ***for transportation of its coal purchases. If yes, provide the***  
14 ***name of the related party and nature of the relationship, the***  
15 ***period of time it has contracted with the party and copies of any***  
16 ***contracts with the related party if not previously filed with the***  
17 ***Commission.***

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**March 22, 2021**

1     **c. Explain in detail BREC’s policies and procedures for entering into**  
2             **transportation contracts.**

3  
4 **Response)** Please see the table below for coal purchase contracts with and without  
5 transportation.

6

<b>Big Rivers Electric Corporation Coal Purchase Contracts with and without Transportation November 1, 2018, through October 31, 2020</b>			
<b>Time Frame</b>	<b>Number of Contracts</b>	<b>With Transportation</b>	<b>Without Transportation</b>
November – December 2018	Seven (7) Contracts	One (1) Contract	Six (6) Contracts
January – August 2019	Nine (9) Contracts	Three (3) Contracts	Six (6) Contracts
September – December 2019	Nine (9) Contracts	Four (4) Contracts	Five (5) Contracts
January 2020	Six (6) Contracts	Two (2) Contracts	Four (4) Contracts
February 2020	Five (5) Contracts	Two (2) Contracts	Three (3) Contracts
March – October 2020	Five (5) Contracts	Two (2) Contracts	Three (3) Contracts

7

8



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1 a. Bidders of coal supply may provide Big Rivers coal pricing F.O.B. mine,  
2 F.O.B. truck or barge, and F.O.B. generating station. Providers of trucked  
3 coal often provide pricing F.O.B. truck or F.O.B. station. Coordinating day-  
4 to-day loading of trucks is a very schedule intensive process sometimes  
5 necessitating hourly communication with truckers in regard to loading,  
6 transit time, return, re-load, *etc.* It is crucial for the mining operations to  
7 be able to control the trucking process and schedule of trucking firms; thus,  
8 they often present their bid offers inclusive of trucking transportation. Big  
9 Rivers evaluates competitive offers provided, with or without the inclusion  
10 of transportation, to procure the most reliable, appropriate quality, and  
11 economic fuel available. In the event the bidder provides a transportation  
12 offer as part of the fuel bid, Big Rivers evaluates it in light of the delivered  
13 cost. Thus, given this evaluation, a supplier is seeking to provide its overall  
14 best possible pricing within its bid. In almost every bid situation whereby  
15 transportation is inclusive in the coal supply contract, the delivered pricing  
16 is offered from local supplying mines that deliver their coal supply via  
17 truck.

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1       b.   When transportation is contracted separately from the coal contract, Big  
2       Rivers will request transportation rates from regional, reputable carriers  
3       to provide transportation services.

4           (1)   The frequency of bids may occur on a one-, two-, or three-year term,  
5                depending upon the coordinating coal supply agreement. For spot coal  
6                supply, the solicitation of transportation rates may occur on a more  
7                frequent basis. The transportation services term may or may not  
8                coordinate with the term of the supply agreement depending upon the  
9                current market for the service.

10          (2)   Big Rivers has not contracted with any related party for  
11          transportation services.

12       c.   Big Rivers policies and procedures for soliciting and entering into  
13       transportation contracts follows the same policies and procedures as those  
14       set forth for fuel procurement.

15

16

17 **Witness)**   Mark W. McAdams