

ORIGINAL



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

ELECTRONIC APPLICATION OF)	
BIG RIVERS ELECTRIC CORPORATION)	
FOR A CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY AUTHORIZING THE)	Case No.
CONVERSION OF THE GREEN STATION UNITS TO)	2021-00079
NATURAL GAS-FIRED UNITS AND AN ORDER)	
APPROVING THE ESTABLISHMENT OF A)	
REGULATORY ASSET)	

**Responses to the Kentucky Industrial Utility Customers, Inc.'s
First Set of Data Requests
dated
March 17, 2021**

FILED: March 26, 201

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION

**ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
AUTHORIZING THE CONVERSION OF THE GREEN STATION UNITS TO
NATURAL GAS-FIRED UNITS AND AN ORDER
APPROVING THE ESTABLISHMENT OF A REGULATORY ASSET
CASE NO. 2021-00079**

VERIFICATION

I, Paul G. Smith, 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.

Paul Smith

Paul G. Smith

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

26th SUBSCRIBED AND SWORN TO before me by Paul G. Smith on this the
day of March, 2021.

Kathleen Riley

Notary Public, Kentucky State at Large

Kentucky ID Number

KYNP16841

My Commission Expires

October 30, 2024

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
AUTHORIZING THE CONVERSION OF THE GREEN STATION UNITS TO
NATURAL GAS-FIRED UNITS AND AN ORDER
APPROVING THE ESTABLISHMENT OF A REGULATORY ASSET
CASE NO. 2021-00079

Response to the Kentucky Industrial Utility Customers, Inc.’s
First Set of Data Requests
dated March 17, 2021

March 26, 2021

1 **Item 1)** *Please provide the amount of depreciation expense related to*
2 *Green Station from Big Rivers’ last rate case.*

3

4 **Response)** In Case No. 2013-00199,¹ Big Rivers proposed an annual depreciation
5 expense related to Green Station of \$9.1 million.

6

7

8 **Witness)** Paul G. Smith

9

¹ See *In the Matter of: Application of Big Rivers Electric Corporation for a General Adjustment in Rates Supported by Fully Forecasted Test Period*, P.S.C. Case No. 2013-00199, Application (filed June 28, 2013).

BIG RIVERS ELECTRIC CORPORATION

**ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
AUTHORIZING THE CONVERSION OF THE GREEN STATION UNITS TO
NATURAL GAS-FIRED UNITS AND AN ORDER
APPROVING THE ESTABLISHMENT OF A REGULATORY ASSET
CASE NO. 2021-00079**

**Response to the Kentucky Industrial Utility Customers, Inc.'s
First Set of Data Requests
dated March 17, 2021**

March 26, 2021

1 **Item 2)** *Please refer to Exhibit Smith-3, page 4 of 7. Given Big Rivers'*
2 *proposal to retire approximately \$67.3 million of Green assets, does Big*
3 *Rivers believe that there should be a corresponding reduction to Green*
4 *depreciation expense?*

5

6 **Response)** Yes, Green Station's monthly depreciation expense will be reduced when
7 the coal-related assets are retired.

8

9

10 **Witness)** Paul G. Smith

11