

1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION

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

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11 **JOINT RECOMMENDATIONS AND MOTION FOR A DECISION ON THE**
12 **EXISTING RECORD**
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14 1. The Attorney General of the Commonwealth of Kentucky, through
15 his Office of Rate Intervention (the “*Attorney General*”), Kentucky Industrial
16 Utility Customers, Inc. (“*KIUC*”), and Big Rivers Electric Corporation (“*Big*
17 *Rivers*”) respectfully move the Kentucky Public Service Commission (the
18 “*Commission*”)¹ to submit this proceeding for a decision based on the existing
19 record, and they recommend that the Commission issue an Order:

- 20 • Granting Big Rivers a certificate of public convenience and necessity
21 (“*CPCN*”) to convert the two existing coal-fired generating units at its
22 Robert D. Green generating station (“*Green Station*”) to natural gas-fired
23 units;

¹ The Attorney General, KIUC, and Big Rivers collectively be referred to herein as the “*Parties*.”

- 1 • Authorizing Big Rivers to depreciate the Green Station gas conversion
2 assets over a seven-year period;
- 3 • Authorizing Big Rivers to establish a regulatory asset to defer the costs it
4 incurs relating to the retirement of the existing Green Station coal-related
5 assets that will no longer be utilized after the conversion, including but not
6 limited to the remaining unrecovered net book value (at the time of the gas
7 conversion) of the assets that will be retired, as well as other costs incurred
8 to decommission those assets, such as severance costs and the costs of
9 removing and disposing of materials and structures; and
- 10 • Authorizing Big Rivers to include the proposed regulatory asset in the list
11 of “*Smelter Loss Mitigation Regulatory Assets*” that the Commission
12 authorized Big Rivers to amortize over the remaining term of the all-
13 requirements contracts with its Members (through December 31, 2043) in
14 Case No. 2020-00064.

15 2. Should the Commission find that the hearing in this matter is
16 necessary, the Parties reserve the right to fully participate in that hearing.

17 WHEREFORE, the Parties respectfully request that the Commission submit
18 this proceeding for a decision based on the existing record, and grant the relief
19 recommended herein.

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On this the 4th day of May, 2021.

Respectfully submitted,

ATTORNEY GENERAL OF THE
COMMONWEALTH OF KENTUCKY, BY
AND THROUGH HIS OFFICE OF RATE
INTERVENTION



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KENTUCKY INDUSTRIAL UTILITY
CUSTOMERS, INC.



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