

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC APPLICATION OF BIG RIVERS	)	
ELECTRIC CORPORATION FOR	)	Case No. 2021-00378
ENFORCEMENT OF ORDER	)	

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**REPLY OF BIG RIVERS ELECTRIC CORPORATION  
TO THE CITY OF HENDERSON’S  
RESPONSE TO MOTION TO LIFT ABEYANCE**

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Big Rivers Electric Corporation (“Big Rivers”) submits its Reply to the City of Henderson, Kentucky, and the Henderson Utility Commission, d/b/a Henderson Municipal Power & Light’s (jointly referenced hereinafter as "Henderson" or “City”) Response to Big Rivers’ Motion to Lift Abeyance.

**ARGUMENT**

**I. Big Rivers’ Withdrawal Of Its Counterclaim At The Franklin Circuit Court Eliminated The Basis For An Abeyance Of This Matter.**

The entire basis for the Commission’s October 11, 2021 Order holding this proceeding in abeyance was a pending ruling from the Franklin Circuit Court on the City’s Motion to Dismiss Big Rivers’ Counterclaim.<sup>1</sup> The Order provides:

1. BREC’s application is held in abeyance pending a ruling from the Franklin Circuit Court on Henderson’s motion to dismiss BREC’s counterclaim filed in Civil Action No. 21-CI-00667;
2. BREC shall provide the Commission notice of entry of any orders of the Franklin Circuit Court related to its counterclaim and the motion to dismiss in this docket; and

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<sup>1</sup> Order (October 11, 2021) at 2.

3. This docket shall remain open pending further action of the Franklin Circuit Court and all other pending motions shall be held in abeyance under further Order of the Commission.”<sup>2</sup>

In response to the Commission’s Order and in order to prevent substantial delay in resolving the Station Two Contract issues, Big Rivers withdrew its Counterclaim with prejudice on October 12, 2021.<sup>3</sup> By withdrawing its Counterclaim with prejudice, Big Rivers addressed the Commission’s stated need for the abeyance of this proceeding. Consequently, given that Big Rivers’ Counterclaim is no longer pending before the Court, the abeyance should be lifted.

**II. The Mere Filing Of An Appeal Is Not A Sufficient Reason For A Stay Or Abeyance Of A Commission Order.**

Despite the fact that the Commission’s stated basis for abeyance has been resolved, the City insists that this case should continue to be delayed on other grounds. Henderson first asks the Commission to deny Big Rivers’ Motion to Lift Abeyance because Henderson has filed an appeal of the Commission’s August 2, 2021 Order in Case No. 2019-00269.<sup>4</sup> However, as Big Rivers has repeatedly explained, under KRS 278.390, Commission orders continue in force until they are revoked by the Commission or vacated by a court of competent jurisdiction. KRS 278.390 states in part:

Every order entered by the commission shall continue in force until the expiration of the time, if any, named by the commission in the order, or until revoked or modified by the commission, unless the order is suspended, or vacated in whole or in part, by order or decree of a court of competent jurisdiction.

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<sup>2</sup> Id.

<sup>3</sup> Motion of Big Rivers Electric Corporation to Lift Abeyance (October 18, 2021)

<sup>4</sup> Henderson Response to Big Rivers’ Motion to Lift Abeyance, at 1-2.

Parties must comply with Commission orders while an appeal is pending. As the Kentucky Court of Appeals has held, “*the mere filing of an appeal does not stay the legal effectiveness of an order of the commission. Unless and until the order....is vacated, the order remains in effect.*”<sup>5</sup> If an appeal stayed the effectiveness of a Commission order, then rate case, environmental surcharge, certificate of public convenience and necessity, and other important decisions could be put on hold for years while the appellate process plays out. The system of rate regulation established by the Kentucky Legislature cannot function if non-compliance with a Commission order is condoned merely by filing an appeal.

The Commission recognized this principle in Case No. 2013-00410 when the Kentucky Attorney General (“AG”) moved the Commission to hold a financing application of Kentucky Power Company in abeyance pending the expiration of the statutory deadline to appeal a related case, or until the conclusion of any proceedings before the Franklin Circuit Court. The Commission denied the AG’s motion, finding that a Commission order on appeal remains in effect until it is “*suspended, or vacated in whole or in part, by order or decree of a court of competent jurisdiction*” pursuant to KRS 278.390.<sup>6</sup>

The City has cited no Commission or legal precedent in support of its request that a Commission order should be held in abeyance merely because an appeal is pending. And there is no danger that the City will suffer irreparable harm if the Order is enforced. If the City successfully challenges the Order through the appellate process and a refund of costs paid by the City is required at the conclusion of the appeal, then Big Rivers would comply

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<sup>5</sup> *Jent v. Ky. Utils. Co.*, 332 S.W.3d 102, 105 (Ky App. 2010).

<sup>6</sup> Case No. 2013-00410, Order (December 6, 2013) at 4.

with that decision. Because of this refund safeguard, Henderson will be fully protected from complying with the Commission's decision while an appeal is pending.

Big Rivers initiated this proceeding because the City has not paid any of the amounts due pursuant to the Commission's August 2, 2021 Order. Holding this proceeding in abeyance would allow Henderson to continue to defy that Order until its appellate rights are exhausted. A process that could take years. Such an outcome is prohibited by KRS 278.390.

### **III. The Order Is Precise As To The Rates And Service Standards Set Forth Under the Station Two Contracts.**

Henderson next argues that the Order is not sufficiently precise to serve as a basis for any monetary judgment and is "*impossible*" to enforce.<sup>7</sup> This interpretation of the Order is incorrect. First, the Commission issued an order regarding rates and services. The Commission did not render a monetary judgment. Second, the actual text of the Commission's Order specifically describes the costs that Henderson and Big Rivers must pay pursuant to the Station Two Contracts.

Beginning on page 10 of the Order, the Commission systematically breaks down the Accounting Summary that shows Henderson's share of Station Two costs that were disputed in that case. The Commission addresses each category of costs identified in the Accounting Summary and identifies how each parties' share of these costs is to be calculated, including

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<sup>7</sup> Henderson Response to Big Rivers' Motion to Lift Abeyance, at 2.

MISO costs,<sup>8</sup> the allocation of operating and maintenance costs,<sup>9</sup> severance costs,<sup>10</sup> and Green Landfill operating and maintenance costs.<sup>11</sup> The only category of costs that cannot be specifically calculated using the method prescribed in the Order are the decommissioning costs that have not yet been incurred. But for these forward-looking costs, the Order prescribes a specific method of cost allocation and requires that each party pay its share based on Henderson's preferred "*time-weighted capacity*" method.<sup>12</sup> Big Rivers intends to bill the City for ongoing decommissioning costs as those costs are incurred.

Big Rivers has already provided invoices, first to Henderson and then to the Commission in this proceeding, properly quantifying the costs addressed in the August 2, 2021 Order. Big Rivers' invoices to Henderson followed the Commission's August 2, 2021 Order to the letter. As those invoices reflect, as of June 30, 2021, Henderson owed Big

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<sup>8</sup> Order at 19 ("*[T]he Commission finds that Henderson should be responsible for the MISO costs as alleged by BREC.*").

<sup>9</sup> Id. at 20 ("*[T]he Commission finds that the operating and maintenance costs for Station Two in FY 2018/2019 should be based on a reservation of 120 MW. As noted by Henderson, a decrease in the sharing percentage based on a 115 MW reservation as opposed to a 125 MW reservation would result in a decrease in the allocated expense for FY 2018/2019 in the amount of \$454,090 as calculated by Henderson. Thus, the Commission finds that the allocated expense in FY 2018/2019 should be decreased by \$227,045.*").

<sup>10</sup> Id. at 24-25 ("*[T]he Commission finds that the severance payments to employees whose employment was terminated as a result of the closure of Station Two, in the amount of \$2,998,970, were reasonable expenses for the operation and maintenance of Station Two that are recoverable from Henderson, subject to the relevant sharing mechanism, pursuant to the Power Plant Construction and Operation Agreement. However, as noted by Henderson and acknowledged by BREC, BREC's Interim Accounting Summary attached to the application reflected budgeted severance payments of \$3,356,897, as opposed to the \$2,998,970 actually made, and therefore, the costs in the FY 2018/2019 budget reconciliation would need to be adjusted by \$143,400 to reflect that change.*").

<sup>11</sup> Id. at 28 ("*[T]he Commission finds the costs of the vertical wall expansion were prudent, that BREC properly calculated Henderson's share of those costs through FY 2018/2019, except with respect to the capacity allocation in FY 2018/2019 as discussed above, and that Henderson should be responsible for its share of those costs through FY 2018/2019.*").

<sup>12</sup> Id. at 34 ("*The Commission also agrees with Henderson's contention that decommissioning of joint use facilities, where applicable, should be determined by the time-weighted capacity of the units supported by the facility as opposed to an allocation based solely on the shared capacity at Station Two, as that is the most reasonable method of cost allocation and is consistent with the intent of the Station Two Contracts. Further, because the decommission costs are constantly in flux as decommissioning is ongoing, the Commission declines to find that there is a specific amount owed for decommissioning costs at this time. Rather, the Commission only finds that BREC and Henderson are responsible for decommissioning costs as described above.*").

Rivers \$214,398.94 in non-decommissioning costs and \$1,498,063.95 in decommissioning costs.<sup>13</sup>

If Henderson has a legitimate dispute regarding Big Rivers' calculations, the appropriate response is not to delay this matter indefinitely through an abeyance. Instead, the City should raise its issues as soon as possible so that those issues can be expeditiously addressed by the Commission. To date, Henderson has not disputed Big Rivers' calculation of any of these items either formally with the Commission or informally with Big Rivers, simply arguing that the City should pay nothing until the appellate process is exhausted. This argument is counter to the clear language of KRS 278.390.

### **CONCLUSION**

WHEREFORE, Big Rivers respectfully request that the Commission grant its Motion to lift the abeyance.

Respectfully submitted,

Tyson Kamuf, Esq.  
Senthia Santana, Esq.  
BIG RIVERS ELECTRIC CORPORATION  
201 Third Street, P.O. Box 24  
Henderson, Kentucky 42419-0024  
Ph: (270) 827-2561 Fax: (270) 844-6417  
[tyson.kamuf@bigrivers.com](mailto:tyson.kamuf@bigrivers.com)  
[senthia.santana@bigrivers.com](mailto:senthia.santana@bigrivers.com)

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<sup>13</sup> Motion for Enforcement, Attachment 1 is attached hereto.

/s/ Michael L. Kurtz  
Michael L. Kurtz, Esq.  
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Jody Kyler Cohn, Esq.  
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***COUNSEL FOR BIG RIVERS ELECTRIC  
CORPORATION***

October 26, 2021

# ATTACHMENT 1





201 Third Street  
P.O. Box 24  
Henderson, KY 42419-0024  
570-827-2561  
www.bigrivers.com

**VIA HAND DELIVERY AND CERTIFIED MAIL**

August 13, 2021

Mr. Chris Heimgartner  
General Manager  
Henderson Municipal Power & Light  
100 Fifth Street  
Henderson, Kentucky 42420

Dear Chris:

Enclosed herein for payment are Big Rivers' invoices issued pursuant to the Kentucky Public Service Commission's August 2, 2021 Order in Case No. 2019-00269.

The first invoice amounts to \$214,398.94 which reflects the final sum due relating to all issues addressed in the Commission's Order other than decommissioning costs. The Fiscal Year 2018/19 Annual Settlement True-Up amount has been reduced to reflect Henderson's 120 MW reservation instead of 125 MW as previously stated by Big Rivers, and to include the actual severance costs incurred instead of the projected amount.

The second invoice amounts to \$1,498,063.95 which is the share of decommissioning costs that Henderson is required to pay, pursuant to the Commission's Order, through June of 2021. Per the Commission's Order, the decommissioning cost allocation reflects HMPL's capacity reservation of 120 MW in fiscal year 2018/19, includes the Reid Station in the calculation for the joint-use facilities (e.g. Station Two ash pond) resulting in an allocation of 18.90%, and reflects the landfill allocation of 9.88% pre-2021 and 9.81% in 2021. The supporting calculation for each allocation percentage is attached. As the Commission noted, the amount of decommissioning costs is in flux as decommissioning is ongoing. Therefore, Big Rivers will issue additional invoices to Henderson, monthly, as decommissioning costs are incurred.

Payment of the attached invoices is due immediately upon receipt.

If you have any questions about your invoices, please contact Big Rivers' Chief Financial Officer, Paul Smith at 270-844-6194, or [paul.smith@bigrivers.com](mailto:paul.smith@bigrivers.com).

Sincerely,

Robert W. Berry  
President and Chief Executive Officer  
Big Rivers Electric Corporation



Big Rivers Electric Corporation  
P.O. Box 24  
201 Third Street  
Henderson, KY 42419-0024  
Ph (270) 827-2561 Fax (270) 827-2558

Invoice No. BR32019  
REVISED 8/13/2021

Henderson Municipal Power & Light P.O. Box 8 Henderson, KY 42419-0008	Date 8/13/2021
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Description		Amount
Excess Henderson Energy - MISO Revenue less Coal & Lime Shortfall	01/05/18 - 05/31/19	(\$3,310,482.54)
HMP&L Native Load Coal & Lime Shortfall	01/05/18 - 05/31/19	\$4,693,587.29
MISO Fees	12/01/10 - 05/31/16	\$1,422,761.54
FY 17/18 Annual Settlement True-Up	06/01/17 - 05/31/18	(\$1,649,922.53)
FY 18/19 Annual Settlement True-Up (Note 1)	06/01/18 - 05/31/19	(\$1,020,295.80)
Auxiliary Power	10/01/18 - 01/31/19	\$78,750.98
Decommissioning Costs (Note 2)		n/a
<b>INVOICE INQUIRIES CONTACT:</b> Katie Cheatham 270-844-6065 <a href="mailto:katie_cheatham@bigrivers.com">katie_cheatham@bigrivers.com</a>		
<b>Payment due immediately upon receipt</b>	<b>TOTAL</b>	<b>\$214,398.94</b>

Note 1: Revised per Kentucky Public Service Commission Order in Case No. 2019-00269:

Original Invoice BR2019	\$ (649,850.80)
Adjust HMP&L 120 MW Reservation	(227,045.00)
Adjust Severance to Actual Cost	(143,400.00)
Revised FY 18/19 Settlement True-Up	<u>\$(1,020,295.80)</u>

Note 2: Revised invoice excludes Decommissioning Costs, which is billed separately.



Big Rivers Electric Corporation  
P.O. Box 24  
201 Third Street  
Henderson, KY 42419-0024  
Ph (270) 827-2561 Fax (270) 827-2558

Invoice No. BR06-2021

Henderson Municipal Power & Light P.O. Box 8 Henderson, KY 42419-0008	Date 8/13/2021
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Description		Amount
Decommissioning Costs	01/01/19 - 06/30/21	\$1,498,063.95

INVOICE INQUIRIES CONTACT:  
Katie Cheatham  
270-844-6065  
[katie.cheatham@bigrivers.com](mailto:katie.cheatham@bigrivers.com)

Payment due immediately upon receipt

TOTAL **\$1,498,063.95**

**BIG RIVERS ELECTRIC CORPORATION  
STATION TWO CAPACITY SPLITS**

Fiscal Year	STATION TWO (Capacity Reservation)			STATION TWO ASH POND (Capacity Reservation Including Reid)			
	Big Rivers Share	HMPL Share	Station Two	Reid	Rivers Share	HMPL Share	Total Ash Pond
6/01/73 - 5/31/74	162	13	175	65	227	13	240
6/01/74 - 5/31/75	283	17	300	65	348	17	365
6/01/75 - 5/31/76	271	18	289	65	336	18	354
6/01/76 - 5/31/77	267	22	289	65	332	22	354
6/01/77 - 5/31/78	262	27	289	65	327	27	354
6/01/78 - 5/31/79	262	34	296	65	327	34	361
6/01/79 - 5/31/80	256	41	297	65	321	41	362
6/01/80 - 5/31/81	256	40	296	65	321	40	361
6/01/81 - 5/31/82	253	43	296	65	318	43	361
6/01/82 - 5/31/83	253	43	296	65	318	43	361
6/01/83 - 5/31/84	270	45	315	65	335	45	380
6/01/84 - 5/31/85	268	47	315	65	333	47	380
6/01/85 - 5/31/86	271	44	315	65	336	44	380
6/01/86 - 5/31/87	271	44	315	65	336	44	380
6/01/87 - 5/31/88	270	45	315	65	335	45	380
6/01/88 - 5/31/89	269	46	315	65	334	46	380
6/01/89 - 5/31/90	264	51	315	65	329	51	380
6/01/90 - 5/31/91	264	51	315	65	329	51	380
6/01/91 - 5/31/92	263	52	315	65	328	52	380
6/01/92 - 5/31/93	262	53	315	65	327	53	380
6/01/93 - 5/31/94	261	54	315	65	326	54	380
6/01/94 - 5/31/95	258	57	315	65	323	57	380
6/01/95 - 5/31/96	250	62	312	65	315	62	377
6/01/96 - 5/31/97	250	62	312	65	315	62	377
6/01/97 - 5/31/98	247	65	312	65	312	65	377
6/01/98 - 5/31/99	246	66	312	65	311	66	377
6/01/99 - 5/31/00	232	80	312	65	297	80	377
6/01/00 - 5/31/01	225	87	312	65	290	87	377
6/01/01 - 5/31/02	220	92	312	65	285	92	377
6/01/02 - 5/31/03	217	95	312	65	282	95	377
6/01/03 - 5/31/04	217	95	312	65	282	95	377
6/01/04 - 5/31/05	217	95	312	65	282	95	377
6/01/05 - 5/31/06	217	95	312	65	282	95	377
6/01/06 - 5/31/07	217	95	312	65	282	95	377
6/01/07 - 5/31/08	217	95	312	65	282	95	377
6/01/08 - 5/31/09	217	95	312	65	282	95	377
6/01/09 - 5/31/10	212	100	312	65	277	100	377
6/01/10 - 5/31/11	207	105	312	65	272	105	377
6/01/11 - 5/31/12	202	110	312	65	267	110	377
6/01/12 - 5/31/13	197	115	312	65	262	115	377
6/01/13 - 5/31/14	197	115	312	65	262	115	377
6/01/14 - 5/31/15	197	115	312	65	262	115	377
6/01/15 - 5/31/16	197	115	312	65	262	115	377
6/01/16 - 5/31/17	197	115	312		197	115	312
6/01/17 - 5/31/18	197	115	312		197	115	312
6/01/18 - 5/31/19	192	120	312		192	120	312
<b>Total (MW)</b>	<b>10,900</b>	<b>3,191</b>	<b>14,091</b>	<b>2,795</b>	<b>13,695</b>	<b>3,191</b>	<b>16,886</b>
<b>% Allocation</b>	<b>77.35%</b>	<b>22.65%</b>			<b>81.10%</b>	<b>18.90%</b>	

## Poz-O-Tec Summary Sheet for Sebree Station

YEAR/TONS	Total Sebree Station		Station Two							Total Sebree		Reid Station	
	Poz-O-Tec Hauled Off-Site	Green Station	Total Station Two	Station Two (%)	BREC	BREC (%)	City	City (%)	City % Total Sebree	Total Station	Total Reid	Reid %	
2018	482,280	480,461	1,813	0%	92	5%	1,737	95%	0.38%	462,283			
2019	636,506	573,318	123,188	18%	34,761	28%	98,427	72%	12.79%	636,506			
2017	666,378	447,963	218,415	33%	71,080	33%	147,335	67%	22.11%	666,378			
2016	841,346	505,944	336,001	50%	183,023	54%	152,978	46%	18.17%	841,346			
2015	749,019	413,906	335,713	45%	200,598	60%	135,115	40%	18.04%	749,019			
2014	1,032,187	603,851	428,336	41%	304,910	71%	123,426	29%	11.96%	1,032,187			
2013	989,410	598,703	380,707	39%	272,891	70%	117,816	30%	11.96%	989,410			
2012	899,440	505,972	394,068	44%	273,107	69%	120,961	31%	13.45%	899,440			
2011	1,042,952	801,138	441,814	44%	356,384	74%	115,430	28%	11.97%	1,042,952			
2010	1,067,894	800,306	487,888	44%	339,797	73%	105,349	27%	11.97%	1,067,894			
2009	989,816	578,128	411,688	59%	306,338	74%	109,380	29%	10.64%	989,816			
2008	1,044,589	580,703	363,886	66%	284,767	70%	108,380	30%	10.38%	1,044,589			
2007	1,064,959	672,990	391,859	63%	294,267	72%	107,202	27%	10.70%	1,064,959			
2006	1,270,139	862,923	408,066	68%	307,093	72%	100,973	25%	10.07%	1,270,139			
2005	1,170,810	723,992	437,418	83%	308,437	37%	128,981	29%	11.02%	1,170,810			
2004	989,737	670,581	419,158	58%	287,268	71%	121,887	29%	11.32%	989,737			
2003	1,036,562	687,429	371,553	64%	263,486	71%	107,867	29%	10.39%	1,036,562			
2002	1,024,930	623,021	401,509	61%	281,502	70%	120,407	30%	11.25%	1,024,930			
2001	989,294	590,789	438,495	56%	327,559	75%	115,297	25%	11.25%	989,294			
2000	944,453	551,668	382,825	58%	267,528	68%	125,297	32%	13.27%	944,453			
1999	933,221	585,049	350,172	65%	251,900	72%	98,271	28%	10.51%	933,221			
1998	1,022,393	653,348	389,644	64%	281,998	36%	87,046	24%	8.51%	1,022,393			
1997	933,671	605,801	327,870	65%	281,501	77%	75,969	23%	8.14%	933,671			
1996	977,317	684,139	313,178	68%	242,046	32%	71,132	23%	7.28%	977,317			
1995	563,085	410,110	152,875	73%	120,089	79%	32,886	21%	5.84%	563,085			
	23,407,017	132,633	6,687,653	37.12%	6,054,064	25.86%	2,633,589	11.25%		23,407,017			
		83,405	49,228		34,305		14,933						
Share of Poz-o-tec Hauled off site	132,633	83,405	49,228		34,305		14,933						
Poz-o-tec in the landfill	23,274,384	14,835,958	8,639,426		6,019,759		2,518,657						
<b>Pre-1995 Calculated Values</b>													
Prior to 1982 (Stored in Station Two ash pond)					637,271		74,097				192,703		
1982 to 1994 (Wash to Green IUCS)					784,465		128,239				90,138		
1982 to 1994 (Bottom ash to Station Two ash pond)					176,116		32,060				22,535		
1979 to 1994 Green Ash Produced		3,530,990											
<b>Pre-2020 GRAND TOTAL</b>	<b>28,862,697</b>	<b>18,166,648</b>	<b>62,94%</b>		<b>7,637,612</b>	<b>26.12%</b>	<b>2,853,063</b>	<b>9.88%</b>			<b>305,375</b>	<b>1.05%</b>	
2020	229,416	229,416	100%	0%	0	0%	0	0%	0.00%	229,416			
<b>2020 GRAND TOTAL</b>	<b>29,092,113</b>	<b>18,396,064</b>	<b>63.23%</b>		<b>7,637,612</b>	<b>26.91%</b>	<b>2,853,063</b>	<b>9.81%</b>			<b>305,375</b>	<b>1.05%</b>	

Big Rivers Electric Corporation  
A/R HMP&L - Decommissioning Costs

STATION TWO	GROSS TOTAL	REID	GREEN	STATION TWO	MONTHS											
					Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
SI Only	\$ 3,092,434.88	28,370.29	141.77	\$ 3,092,434.88	\$ 33,249.06	\$ 125,298.00	\$ 99,116.61	\$ 80,190.15	\$ 34,627.55	\$ 39,997.20	\$ 21,308.47	\$ 303,045.45	\$ 96,559.69	\$ 101,889.69	\$ 104,642.25	\$ 120,948.15
RD/SII	164,547.68	20.30	141.77	136,177.39	13,987.46	8,385.80	19,808.22	46,167.88	33,367.54	14,748.77	(248.28)	-	-	-	-	-
RD/GN/SII	259.50	-	-	97.43	-	63.14	34.29	-	-	-	-	-	-	-	-	-
Auxiliary Power	3,257,242.06	28,390.59	141.77	3,228,709.70	47,196.52	133,746.94	118,959.12	126,358.03	67,995.09	54,745.97	21,060.19	303,045.45	96,559.69	101,889.69	104,642.25	120,948.15
Henderson Allocation Percentage - Decommission Rampdown & Aux Power Total	204,778.51	-	-	204,778.51	-	20,523.60	13,730.35	8,770.55	5,265.19	4,649.23	5,471.11	4,767.14	5,022.21	5,525.23	7,558.70	6,176.31
Henderson Allocation Percentage - Decommission Rampdown & Aux Power Total	22.65%	-	-	22.65%	10.690.02	34,942.29	30,054.16	30,606.62	16,593.45	13,453.01	6,009.34	69,719.55	23,008.30	24,329.48	25,413.52	28,793.69
STATION TWO ASH POND & CCR	159,694.49	-	(61.21)	160,305.70	-	-	-	-	-	-	-	-	-	-	-	-
CCR Incremental Costs - SI Only	188,305.28	-	-	188,305.28	-	-	-	-	18,857.61	10,800.00	21,003.30	12,897.08	2,361.41	3,939.50	5,355.21	9,133.68
Ash Pond Closure (BP2003300E)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	175,230.93
Henderson Allocation Percentage - Ash Pond & CCR Total	18.90%	-	-	18.90%	-	-	-	-	3,564.08	2,041.20	3,969.62	2,437.55	446.31	744.57	1,012.13	34,844.91
Slurry Wall (BP19G200E)	2,517,969.96	-	-	2,517,969.96	-	-	-	-	-	-	-	-	-	-	-	1,677,517.68
Leachate (BP19G201E)	1,436,507.99	-	-	1,436,507.99	-	-	-	-	-	-	-	-	-	-	-	1,255,561.43
Landfill Drainage (BP2003301E)	2,781,034.41	-	-	2,781,034.41	-	-	-	-	-	-	-	-	-	-	-	2,933,079.11
Landfill Total	6,735,512.36	-	-	6,735,512.36	-	-	-	-	-	-	-	-	-	-	-	-
Henderson Allocation Percentage - Landfill Decommission (Dec 2019 - Dec 2020)	9.88%	-	-	9.88%	-	-	-	-	-	-	-	-	-	-	-	-
Landfill Decommission (Jan 2021 - Dec 2021)	9.81%	-	-	9.81%	-	-	-	-	-	-	-	-	-	-	-	-
Landfill Total	664,219.23	-	-	664,219.23	-	-	-	-	-	-	-	-	-	-	-	289,788.22
Total Decommissioning Amount Due From Henderson	\$ 1,507,791.79	-	-	\$ 1,507,791.79	\$ 10,690.02	\$ 34,942.29	\$ 30,054.16	\$ 30,606.62	\$ 20,157.53	\$ 15,494.21	\$ 9,978.96	\$ 72,157.10	\$ 23,454.61	\$ 25,074.05	\$ 26,425.65	\$ 353,426.82
Total Allocated Decommissioning Costs	9,727.84	-	-	9,727.84	4,640.39	3,104.43	1,983.02	-	-	-	-	-	-	-	-	-
2019 Payments Received (Auxiliary Power Reb, Mar & Apr)	\$ 1,498,063.95	-	-	\$ 1,498,063.95	\$ 10,690.02	\$ 30,301.90	\$ 26,949.73	\$ 28,623.60	\$ 20,157.53	\$ 15,494.21	\$ 9,978.96	\$ 72,157.10	\$ 23,454.61	\$ 25,074.05	\$ 26,425.65	\$ 353,426.82

