

**ORIGINAL**



**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**In the Matter of:**

<b>AN ELECTRONIC EXAMINATION OF THE</b>	)	
<b>APPLICATION OF THE FUEL ADJUSTMENT CLAUSE</b>	)	<b>Case No.</b>
<b>OF BIG RIVERS ELECTRIC CORPORATION</b>	)	<b>2022-00041</b>
<b>FROM MAY 1, 2021 THROUGH OCTOBER 31, 2021</b>	)	

**Responses to Commission Staff's  
Third Request for Information  
dated June 7, 2022**

**FILED: June 16, 2022**


**ORIGINAL**

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF  
THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE  
OF BIG RIVERS ELECTRIC CORPORATION  
FROM MAY 1, 2021 THROUGH OCTOBER 31, 2021  
CASE NO. 2022-00041**

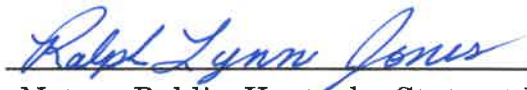
**VERIFICATION**

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 16 day of June, 2022.

  
\_\_\_\_\_  
Notary Public, Kentucky State at Large  
Kentucky ID Number KYNP43026  
My Commission Expires 1-14-2026

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM MAY 1, 2021 THROUGH OCTOBER 31, 2021  
CASE NO. 2022-00041**

**Responses to Commission Staff's  
Third Request for Information  
dated June 7, 2022**

**June 16, 2022**

1 **Item 1)** *Consider the hypothetical situation where a generation unit has*  
2 *been scheduled for a month long maintenance outage and during the course*  
3 *of the outage the utility cannot complete the maintenance work due to*  
4 *COVID-induced labor shortages and supply chain issues. Explain why the*  
5 *Commission should not consider the unit outage to be a forced outage, as*  
6 *defined in 807 KAR 5:056, Section 1(4), as opposed to a continued*  
7 *maintenance outage for the time extending beyond the scheduled outage*  
8 *time.*

9

10 **Response)** Big Rivers follows the guidelines set forth by the North American  
11 Electric Reliability Corporation's (NERC)<sup>1</sup> Generating Availability Data System  
12 (GADS) Data Reporting Instructions to define outage types. In doing so,  
13 Maintenance Outages (MO) are scheduled outages and any unscheduled outage is

---

<sup>1</sup> Generating units larger than 20 MW's and connected to 69 kV and larger tie lines on the BES (Bulk Electric System) are required to report RAM (generation, reliability, and maintainability) information to NERC following their reporting instructions. NERC developed the GADS Data Reporting Instructions to assist utility personnel in reporting information to the Generating Availability Data System (GADS) to ensure consistency in the data across different utilities.

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
FROM MAY 1, 2021 THROUGH OCTOBER 31, 2021  
CASE NO. 2022-00041**

**Responses to Commission Staff's  
Third Request for Information  
dated June 7, 2022**

**June 16, 2022**

1 defined as a forced outage. Per the NERC GADS Data Reporting Instructions, all  
2 work during Maintenance Outage (MO) events is determined in advance and is  
3 referred to as the “original scope of work.” Maintenance Outage Extension (ME) is  
4 used only in instances where the original scope of work requires more time to  
5 complete than originally scheduled. If the time extending beyond the scheduled  
6 outage is not a result of a change to the original scope of work, then the extra time  
7 would be coded as a Maintenance Outage Extension (ME) event and not a forced  
8 outage event.

9

10 **Witness)** Ronald D. Gregory

11