

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) 2022-00041
FROM MAY 1, 2021 THROUGH OCTOBER 31, 2021)**

**Responses to Commission Staff's
Second Request for Information
dated May 9, 2022**

FILED: May 18, 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

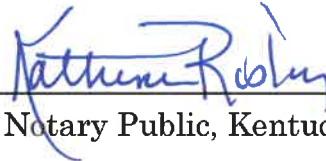
I, Vicky L. Payne, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Vicky L. Payne

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

18th SUBSCRIBED AND SWORN TO before me by Vicky L. Payne on this the
____ day of May, 2022.



Notary Public, Kentucky State at Large

Kentucky ID Number

KY NR 116841

My Commission Expires

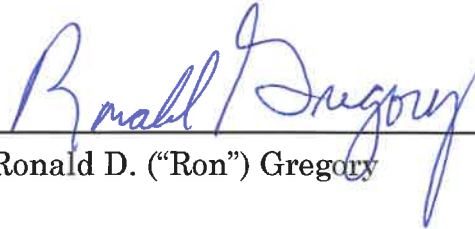
October 31, 2024

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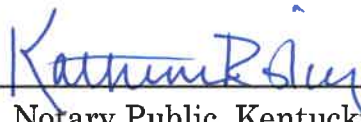
I, Ronald D. ("Ron") Gregory, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Ronald D. ("Ron") Gregory

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Ronald D. ("Ron") Gregory on this the 18th day of May, 2022.



Notary Public, Kentucky State at Large
Kentucky ID Number KYNP16841
My Commission Expires October 31, 2024

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1 **Item 1)** *Refer to BREC's response to Commission Staff's First Request for*
2 *Information (Staff's First Request), Item 3.*

3 *a. Provide a status update on the Green Station conversion to natural*
4 *gas.*

5 *b. Explain whether the Green Station coal pile will be exhausted when*
6 *the station is fully converted to natural gas. If not, explain the*
7 *disposition of any remaining coal.*

8

9 **Response)**

10 a. Green Station's converted Unit Two began operations on May 17, 2022.

11 Big Rivers plans to have Unit One commercialized on May 25, 2022.

12 b. When Green Station is fully converted to natural gas, the coal pile will not
13 be exhausted. There remains roughly four-thousand tons on the ground
14 and approximately one-thousand tons in the coal-bunkers. Big Rivers is
15 currently evaluating selling the coal to an outside party.

16

17

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1

2 **Witness)** Vicky L. Payne

3

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1 **Item 2)** *Refer to BREC's response to Staff's First Request, Item 4, page 2.*
2 *Explain why BREC is willing to accept a higher level of SO₂ in petroleum*
3 *coke versus coal.*

4

5 **Response)** During this period, coal was scarce and in extremely high demand. Big
6 Rivers was blending the petroleum coke with lower heat-rate fuel to keep the units
7 in operation within boiler specification.

8

9

10 **Witness)** Vicky L. Payne

11

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1 **Item 3)** *Refer to BREC's response to Staff's First Request, Item 5. Explain*
2 *which contracts were for R. D. Green station and which were for D. B. Wilson*
3 *Station.*

4

5 **Response)** All five of the contracts were intended for burn primarily at Green
6 Station.

7

8

9 **Witness)** Vicky L. Payne

10

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1 **Item 4)** *Refer to BREC's response to Staff's First Request, Item 15.*

2 *a. Explain the difference between a "Scheduled" and "Forced" Outage.*

3 *b. Explain in detail how far in advance BREC plans its Scheduled*
4 *Outages before taking the units offline.*

5

6 **Response)**

7 a. Big Rivers follows the guidelines set forth by the North American Electric
8 Reliability Corporation's (NERC) Generating Availability Data System
9 (GADS) Data Reporting Instructions to define outage types. In doing so,
10 Planned and Maintenance Outages are scheduled outages and any
11 unscheduled outage is defined as a forced outage.

12 b. A Planned Outage is scheduled well in advance, typically around twenty-
13 four months in advance, and is of a predetermined duration,¹ whereas a
14 Maintenance Outage can occur any time during the year, has a flexible

¹ See Big Rivers' confidential response to Item No. 32 of the Commission's Request for Information in Appendix B of the Commission's Order dated March 4, 2021, in Case No. 2021-00058.

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1 start date, may or may not have a predetermined duration, and is usually
2 much shorter than a Planned Outage. The scheduled outages shown in Big
3 Rivers' response to Staff's First Request, Item No. 15 were Maintenance
4 Outages. The timing between when Big Rivers plans a scheduled outage
5 and when the unit is taken off line varies from two years to a couple of days.
6 This is because assumptions made at the time of scheduling, typically
7 during a budget cycle, can and routinely do change. The assumptions range
8 from weather assumptions up to economic assumptions.

9
10

11 **Witness)** Ronald D. Gregory

12