

**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 First Request for Information  
in the Appendix of the Commission's Order  
dated March 31, 2022**

**FILED: April 14, 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**

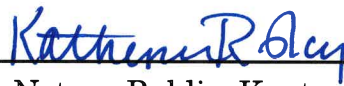
**VERIFICATION**

I, Jason C. Burden, 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.

  
\_\_\_\_\_  
Jason C. Burden

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

14<sup>th</sup> SUBSCRIBED AND SWORN TO before me by Jason C. Burden on this the  
day of April, 2022.

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




**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 14<sup>th</sup> day of April, 2022.

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



**BIG RIVERS ELECTRIC CORPORATION**

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**VERIFICATION**

I, Natalie R. Hankins, 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.

*Natalie R. Hankins*

\_\_\_\_\_  
Natalie R. Hankins

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

14<sup>th</sup> SUBSCRIBED AND SWORN TO before me by Natalie R. Hankins on this the  
day of April, 2022.

*Kathleen Rodey*

\_\_\_\_\_  
Notary Public, Kentucky State at Large

Kentucky ID Number

K4NP16841

My Commission Expires

October 31, 2024



**BIG RIVERS ELECTRIC CORPORATION**

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**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 )

14<sup>th</sup> SUBSCRIBED AND SWORN TO before me by Vicky L. Payne on this the  
day of April, 2022.



\_\_\_\_\_  
Notary Public, Kentucky State at Large

Kentucky ID Number KYNPI6841

My Commission Expires October 31, 2024

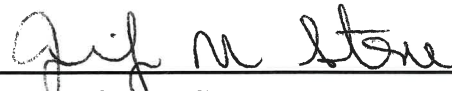


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**VERIFICATION**

I, Jennifer M. Stone, 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.



Jennifer M. Stone

COMMONWEALTH OF KENTUCKY )  
COUNTY OF HENDERSON )

14<sup>th</sup> SUBSCRIBED AND SWORN TO before me by Jennifer M. Stone on this the  
day of April, 2022.



Notary Public, Kentucky State at Large

Kentucky ID Number

K4NP16841

My Commission Expires

October 31, 2024



**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 **Item 1)** *For the period under review, provide the amount of coal*  
2 *purchased in tons and the percentage of purchases that were spot versus*  
3 *contract.*

4

5 **Response)** Please see the schedules below.

6

**For the Period from May 1, 2021, through October 31, 2021**

<b>Purchase Vendor <sup>1</sup></b>	<b>Fuel Type</b>	<b>Purchase Tonnage</b>	<b>Contract Type</b>
ACNR (BRE-20-001A)	Coal	198,247.06	Contract
Alliance (BRE-19-003A)	Coal	292,842.36	Contract
ACNR (BRE-19-002A)	Coal	286,286.25	Contract
Foresight (BRE-21-001)	Coal	272,626.38	Spot
Knight Hawk Coal, LLC (BRE-21-003)	Coal	125,966.72	Spot
Alliance (BRE-21-005)	Coal	65,388.51	Spot
<b>Total Tonnage</b>		<b>1,241,357.28</b>	

**For the Period from May 1, 2021, through October 31, 2021**

Percentage Spot Purchase Tons	37.38 %
Percentage Contract Purchase Tons	62.62 %
Percentage Total Purchase Tons	100.00 %

7

8

<sup>1</sup> ACNR = American Consolidated Natural Resources, Inc.

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**April 14, 2022**

1

2 **Witness)** Vicky L. Payne

3



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
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**Responses to Commission Staff's First Request for Information  
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**April 14, 2022**

- 1 **Item 2)**     *For the period under review, list each coal purchase made under*  
2 *a long-term contract (one year or greater). For each purchase, list:*
- 3     *a. Contract or purchase order number;*
  - 4     *b. The supplier's name;*
  - 5     *c. The location(s) of production facilities from which the coal is*  
6         *sourced;*
  - 7     *d. The method of delivery, (i.e., barge, truck, rail, other);*
  - 8     *e. The actual quantity received during the review period;*
  - 9     *f. The tonnage requirement for the review period; and*
  - 10    *g. The current price paid per ton.*

11

12 **Response)** Please see the attached schedule

13

14

15 **Witness)**    Vicky L. Payne

16

**Big Rivers Electric Corporation**  
**Case No. 2022-00041**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /  
American Consolidated Natural Resources, Inc. (“ACNR”)**

A. CONTRACT NUMBER: BRE-19-002 / BRE-19-002A <sup>1</sup>

B. SUPPLIER’S NAME / ADDRESS: Western Kentucky Consolidated Resources, LLC <sup>1</sup>  
KenAmerican Resources, Inc.  
American Consolidated Natural Resources, Inc.  
46226 National Road  
St. Clairsville, OH 43950

C. PRODUCTION FACILITY: WKCC Genesis Mine  
MCCC Pride Mine  
KenAmerican Paradise Mine  
ACNR Pride Mine (*current source*)

D. METHOD OF DELIVERY: Truck and/or barge

E. ACTUAL TONNAGE:

	2019	–	456,313	Tons	
	2020	–	425,100	Tons	<i>(through December)</i>
	2021	–	418,154	Tons	<i>(through October)</i>
	2021	–	36,558	Option Tons	<i>(through October)</i>

F. ANNUAL TONNAGE REQUIREMENTS:

	2019	–	400,000 min. 500,000 max.	Tons	
	2020	–	400,000 min. 500,000 max.	Tons	
	2020	–	0 min. 125,000 max.	Tons	
	<i>Option</i>				
	2021	–	400,000 min. 500,000 max.	Tons	
	2021	–	0 min. 125,000 max.	Tons	
	<i>Option</i>				

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<sup>1</sup> On September 10, 2020, the WKCR Agreement was assumed by ACNR, and assigned Contract Number BRE-19-002A.

**Big Rivers Electric Corporation**  
**Case No. 2022-00041**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /**  
**American Consolidated Natural Resources, Inc. (“ACNR”) (*continued*)**  
*(Contract Numbers – BRE-19-002 / BRE-19-002A)*

PERCENT OF ANNUAL REQUIREMENTS:	2019 –	101.40 %	<i>(through December)</i> <sup>2</sup>
	2020 –	100.02 %	<i>(through December)</i> <sup>3</sup>
	2021 –	83.63 %	<i>(through October)</i> <sup>4</sup>
	2021 Option –	58.49 %	<i>(through October)</i> <sup>4</sup>
G. CURRENT PRICE ( <i>Base</i> ):	2019 –	\$ 42.85	per Ton
	2020 –	\$ 42.85	per Ton
	2021 –	\$ 42.85	per Ton
CURRENT PRICE ( <i>Contract</i> ):	2019 –	\$ 42.85	per Ton
	2020 –	\$ 43.45	per Ton <sup>5</sup>
	2021 –	\$ 43.45	per Ton <sup>5</sup>
OPTION PRICE ( <i>Contract</i> ):	2020 –	\$ 43.85	per Ton <sup>5</sup>
	2021 –	\$ 44.85	per Ton <sup>5</sup>

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<sup>2</sup> Calculated based on 456,313 nominated tons for 2019. No Option tons nominated. [456,313 tons *divided by* 450,000 tons = 101.40%]

<sup>3</sup> Calculated based on 425,000 nominated tons for 2020. No Option tons nominated. [425,100 tons *divided by* 425,000 tons = 100.02%]

<sup>4</sup> Calculated based on 500,000 nominated tons for 2021, 62,500 nominated *option* tons for 2021. [418,154 *divided by* 500,000 tons = 83.63%; 36,558 *option* tons *divided by* 62,500 tons = 58.49%]

<sup>5</sup> Price increased in 2020 and 2021 by \$0.60 per ton, governmental imposition (Black Lung tax).

**Big Rivers Electric Corporation**  
**Case No. 2022-00041**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC / Alliance Coal, LLC**

A. CONTRACT NUMBER:	BRE-19-003 / BRE-19-003A <sup>6</sup>			
B. SUPPLIER'S NAME / ADDRESS:	Rhino Energy LLC/Pennyrile Energy, LLC. <sup>6</sup> 424 Lewis Hargett Circle, Suite 250 Lexington, KY 40503  Alliance Coal, LLC <sup>6</sup> 1717 South Boulder, Suite 400 Tulsa, OK 74119			
C. PRODUCTION FACILITY:	Pennyrile Energy LLC ( <i>original contract</i> ) Riveredge Mine, McLean County, Kentucky River View Coal, LLC ( <i>upon assignment</i> ) River View Mine, Union County, Kentucky			
D. METHOD OF DELIVERY:	Barge			
E. ACTUAL TONNAGE:	2019	–	69,186 Tons	( <i>through December</i> )
	2020	–	193,770 Tons	( <i>through December</i> )
	2021	–	394,932 Tons	( <i>through October</i> )
F. ANNUAL TONNAGE REQUIREMENTS:	2019	–	100,000 min. Tons 150,000 max.	
	2020	–	100,000 min. Tons 150,000 max.	
	2021	–	350,000 min. Tons 500,000 max.	
	2022	–	200,000 min. Tons 350,000 max.	
	2023	–	200,000 min. Tons 350,000 max.	
PERCENT OF ANNUAL REQUIREMENTS:	2019	–	46.12 %	( <i>through December</i> ) <sup>7</sup>
	2020	–	99.88 %	( <i>through December</i> ) <sup>8</sup>
	2021	–	85.39 %	( <i>through October</i> ) <sup>9</sup>

<sup>6</sup> Assigned to Alliance Coal on September 6, 2019. Referenced following assignment as Rhino/Alliance (BRE-19-003A).

<sup>7</sup> Calculated based on 150,000 ton maximum for 2019 per assignment. [69,187 tons *divided by* 150,000 tons = 46.12%]

<sup>8</sup> Calculated based on 112,500 nominated tons for 2020 *plus* 81,499 tons carryover from 2019 equaling 193,999 tons. [193,770 tons *divided by* 193,999 tons = 99.88%]

<sup>9</sup> Calculated based on 462,500 nominated tons for 2021. [394,932 tons divided by 462,500 tons = 85.39%]

**Big Rivers Electric Corporation**  
**Case No. 2022-00041**  
**Long-Term Fuel Contract Information**

**Rhino Energy LLC / Alliance Coal, LLC (continued)**  
*(Contract Numbers – BRE-19-003 / BRE-19-003A)*

G. CURRENT PRICE ( <i>Base</i> ):	2019	–	\$ 40.67	per Ton ( <i>Jan. – Aug.</i> )
<i>Assigned Prices</i>	2019	–	\$ 38.31	per Ton ( <i>Sept. – Dec.</i> )
	2020	–	\$ 39.37	per Ton
	2021	–	\$ 40.10	per Ton
	2022	–	\$ 41.37	per Ton
	2023	–	\$ 42.35	per Ton
 CURRENT PRICE ( <i>Contract</i> ):	2019	–	\$ 40.67	per Ton ( <i>Jan. – Aug.</i> )
<i>Assigned Prices</i>	2019	–	\$ 38.31	per Ton ( <i>Sept. – Dec.</i> )
	2020	–	\$ 39.37	per Ton
	2021	–	\$ 40.10	per Ton
	2022	–	\$ 41.37	per Ton
	2023	–	\$ 42.35	per Ton

**Big Rivers Electric Corporation**  
**Case No. 2022-00041**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /  
American Consolidated Natural Resources, Inc. (“ACNR”)**

A. CONTRACT NUMBER: BRE-20-001 / BRE-20-001A <sup>10</sup>

B. SUPPLIER’S NAME / ADDRESS: Western Kentucky Consolidated Resources, LLC <sup>10</sup>  
Muhlenberg County Coal Company, LLC  
American Consolidated Natural Resources, Inc.  
46226 National Road  
St. Clairsville, OH 43950

C. PRODUCTION FACILITY: WKCC Genesis Mine  
MCCC Pride Mine  
ACNR Pride Mine (*current source*)

D. METHOD OF DELIVERY: Truck and/or barge

E. ACTUAL TONNAGE:

	2020	–	325,094	Tons	<i>(through December)</i>
	2021	–	326,194	Tons	<i>(through October)</i>
	2021	–	7,697	Option Tons	<i>(through October)</i>

F. ANNUAL TONNAGE REQUIREMENTS:

	2020	–	300,000 min. 400,000 max.	Tons	
	2020	–	0 min. 100,000 max.	Tons	
	<i>Option</i>				
	2021	–	300,000 min. 400,000 max.	Tons	
	2021	–	0 min. 100,000 max.	Tons	
	<i>Option</i>				
	2022		300,000 min. 400,000 max.	Tons	
	2022		0 min. 100,000 max.	Tons	
	<i>Option</i>				
	2023		300,000 min. 400,000 max.	Tons	
	2023		0 min. 100,000 max.	Tons	
	<i>Option</i>				

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<sup>10</sup> On September 10, 2020, the WKCR Agreement was assumed by ACNR and assigned Contract Number BRE-20-001A.

**Big Rivers Electric Corporation**  
**Case No. 2022-00041**  
**Long-Term Fuel Contract Information**

**Western Kentucky Consolidated Resources, LLC (“WKCR”) /**  
**American Consolidated Natural Resources, Inc. (“ACNR”) (continued)**  
*(Contract Numbers – BRE-20-001 / BRE-20-001A)*

PERCENT OF ANNUAL REQUIREMENTS:	2020 –	100.03 %	<i>(through December)</i> <sup>11</sup>
	2021 –	81.55 %	<i>(through October)</i> <sup>12</sup>
	2021 –	15.39 %	<i>(through October)</i> <sup>12</sup>
	Option		
G. CURRENT PRICE ( <i>Base</i> ):	2020 –	\$ 42.75	per Ton ( <i>Jan. – May</i> )
	2020 –	\$ 42.65	per Ton ( <i>June – Dec.</i> )
	2021 –	\$ 43.25	per Ton
	2022 –	\$ 43.70	per Ton
	2023 –	\$ 44.15	per Ton
CURRENT PRICE ( <i>Contract</i> ):	2020 –	\$ 43.35	per Ton ( <i>Jan. – May</i> ) <sup>13</sup>
	2020 –	\$ 43.25	per Ton ( <i>June – Dec.</i> ) <sup>13</sup>
	2021 –	\$ 43.85	per Ton <sup>13</sup>
	2022 –	\$ 43.70	per Ton
	2023 –	\$ 44.15	per Ton
OPTION PRICE ( <i>Contract</i> ):	2020 –	\$ 44.00	per Ton ( <i>Jan. – May</i> ) <sup>13</sup>
	2020 –	\$ 43.90	per Ton ( <i>June – Dec.</i> ) <sup>13</sup>
	2021 –	\$ 44.50	per Ton <sup>13</sup>
	2022 –	\$ 44.35	per Ton
	2023 –	\$ 44.80	per Ton

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<sup>11</sup> Calculated based on 325,000 nominated tons for 2020. No Option tons nominated. [325,094 tons *divided by* 325,000 tons = 100.03%]

<sup>12</sup> Calculated based on 400,000 nominated tons for 2021, and 50,000 nominated *option* tons for 2021. [326,194 tons *divided by* 400,000 tons = 81.55%; 7,697 *option* tons *divided by* 50,000 tons = 15.39%]

<sup>13</sup> Price increased by \$0.60 per ton for governmental imposition (Black Lung tax).

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION  
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**April 14, 2022**

- 1 Item 3) *As of the last day of the review period:*
- 2 a. *State the coal inventory level in tons and in number of days' supply.*
- 3 *Provide this information by generating station and in the*
- 4 *aggregate.*
- 5 b. *Describe the criteria used to determine number of days' supply.*
- 6 c. *State the target coal inventory level for each generating station, and*
- 7 *for the total system.*
- 8 d. *If actual coal inventory exceeds the target inventory by ten days'*
- 9 *supply, state the reasons for the excess inventory.*
- 10 e. *State whether any significant changes in the current coal inventory*
- 11 *target are expected within the next 12 months. If so, state the*
- 12 *expected change and the reasons for this change.*

13

14



**BIG RIVERS ELECTRIC CORPORATION**

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1 **Response)**

2 a. As of October 31, 2021, Big Rivers' generating stations individually, and in  
3 the aggregate, had the inventory levels and days' supply shown in the table  
4 below.

<b>Total System / Station</b>	<b>Inventory Level (Tons) <sup>1</sup></b>	<b>Number of Days' Supply <sup>2</sup></b>	<b>Preceding Six-Month Operating Duration (In Days)</b>	<b>Preceding 6 Months Burn (In Tons)</b>
<b>Big Rivers Electric System</b>	160,689.40	18	162	1,454,496.91
<b>Green Station</b>	58,706.74	13	161	750,440.66
<b>Wilson Station</b>	101,982.66	24	165	704,056.25

5

6 b. Number of Days' Supply =

$$\frac{\text{Current Inventory (Tons)}}{\text{Preceding 6 Months Burn (Tons)}} \times \text{Duration (In Days)}$$

7

8 c. Big Rivers Electric Corporation's Target Supply is the following range for  
9 each Station in days based on the projected annual fuel burn:

<b>Big Rivers Electric Corporation Coal Inventory Target Ranges</b>	
Total System	30 – 60 Days
Green	30 – 60 Days
Wilson	30 – 60 Days

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1 d. Not Applicable. Actual coal inventory did not exceed the target inventory by ten  
2 days' supply during the period under review.

3 e.

4 (1) Yes, Big Rivers anticipates a change in coal inventory at its R.D. Green  
5 generating station within the next twelve (12) months.

6 (2) Because of the continuing conversion of the R. D. Green coal-fired  
7 generating units to natural gas, Big Rivers has reduced the coal  
8 inventory at the R.D. Green generating station through March 31,  
9 2022.

10

**Footnotes to table in sub-part a. above -**

1. - Green Station and Wilson Stations each had a pet coke inventory of zero tons as of October  
31, 2021. Petroleum coke has not been purchased due to market pricing versus coal.

2. - Number of days' supply is rounded to reflect whole days.

11

12

13 **Witness)** Vicky L. Payne

14

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 Item 4) *List each written coal supply solicitation issued during the*  
2 *period under review.*

3 a. *For each solicitation, provide the date of the solicitation, the type of*  
4 *solicitation (contract or spot), the quantities solicited, a general*  
5 *description of the quality of coal solicited, the period over which*  
6 *deliveries were requested, and the generating unit(s) for which the*  
7 *coal was intended.*

8 b. *For each solicitation, state the number of vendors to whom the*  
9 *solicitation was sent, the number of vendors who responded, and the*  
10 *selected vendor. Provide the bid tabulation sheet or corresponding*  
11 *document that ranked the proposals. (This document should*  
12 *identify all vendors who made offers.) State the reasons for each*  
13 *selection. For each lowest-cost bid not selected, explain why the bid*  
14 *was not selected.*

15

16

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 **Response)**

2 BREC 21-04 (Spot and Term Solicitation)

3 a.

4 i. Date solicitation was issued: July 7, 2021;

5 Date solicitation was returned: July 28, 2021.

6 ii. Type of solicitation: Spot September 2021 through April 2022 and Term  
7 (2022 – 2024) written bid solicitation (web-based distribution).

8 iii. Quantities solicited: Spot up to 50,000 tons; Term – up to 500,000 tons  
9 per year.

10 iv. Quality of coal and petroleum coke solicited:

11 (a) BTU/lb: 10,500 to 13,500;

12 (b) Ash (lbs./MMBTU): 0.74 to 14.29;

13 (c) Moisture (lbs./MMBTU): 8.89 to 11.90;

14 (d) Sulfur (lbs. SO<sub>2</sub>): 5.50 to 6.50 (coal); and

15 (e) Sulfur (lbs. SO<sub>2</sub>): up to 8.50 (petroleum coke).

16

**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**

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- 1 v. Time period over which deliveries were requested:
- 2 (a) Spot solicitation: September 1, 2021, through April 30, 2022;
- 3 (b) Term solicitation: Years 2022 through 2024.
- 4 vi. Generating units for which coal was intended include: R.D. Green and D.
- 5 B. Wilson.
- 6 b.
- 7 i. Number of vendors solicited: The coal solicitation was posted to Big
- 8 Rivers' website for supplier review, print-out, and written bid proposal
- 9 submission. Big Rivers also notified coal and petroleum coke newsletters
- 10 and journals of the solicitation and its placement on Big Rivers' website,
- 11 referring to the web address for review and download. For Bid BREC 21-
- 12 04 there were fourteen (14) unique page views of the bid.
- 13 ii. Responding vendors: Five (5) vendors replied to the spot and term bid
- 14 solicitation.
- 15

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1       iii. Selected Vendors:

2           (a) Spot fuel supply:

3                   Alliance Coal, LLC (BRE-21-005). Alliance Coal and Koch Carbon  
4                   were the only two spot bidders. [REDACTED]

5                   [REDACTED]

6                   [REDACTED]

7                   [REDACTED]

8                   [REDACTED]

9                   [REDACTED]

10                  [REDACTED].

11           (b) Term fuel supply:

12                   Big Rivers also executed two term supply agreements due to start  
13                   January 2022 and continue through December 2024. The conversion  
14                   of the R. D. Green generating units to natural gas<sup>2</sup> was pushed out

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<sup>2</sup> See *In the Matter of: 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*

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1 an additional month due to high demand of units. The on-going  
2 installation of the flue gas desulphurization unit at the D. B. Wilson  
3 generating station<sup>3</sup> has delayed [REDACTED].

4 American Consolidated Natural Resources / Pride Mine  
5 (BRE-22-001). [REDACTED]

6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]

10 Alliance Coal, LLC / River View Mine (BRE-22-002). [REDACTED]  
11 [REDACTED]

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*Gas-Fired Units and an Order Approving the Establishment of as Regulatory Asset, Case No. 2021-00079. Application filed March 1, 2021; Final Order issued June 23, 2021.*

<sup>3</sup> *In the Matter of: Electronic Application Of Big Rivers Electric Corporation For Approval Of Its 2020 Environmental Compliance Plan, Authority To Recover Costs Through A Revised Environmental Surcharge And Tariff, The Issuance Of A Certificate Of Public Convenience And Necessity For Certain Projects, And Appropriate Accounting And Other Relief, Case No. 2019-00435. Application filed February 7, 2020; Final Order issued August 6, 2020. See inter alia, Application and Direct Testimony of Michael T. Pullen.*

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1  
2  
3  
4  
5  
6  
7  
8  
9

[REDACTED]

iv. A confidential bid tabulation file is provided with these responses.

**Witness)** Vicky L. Payne



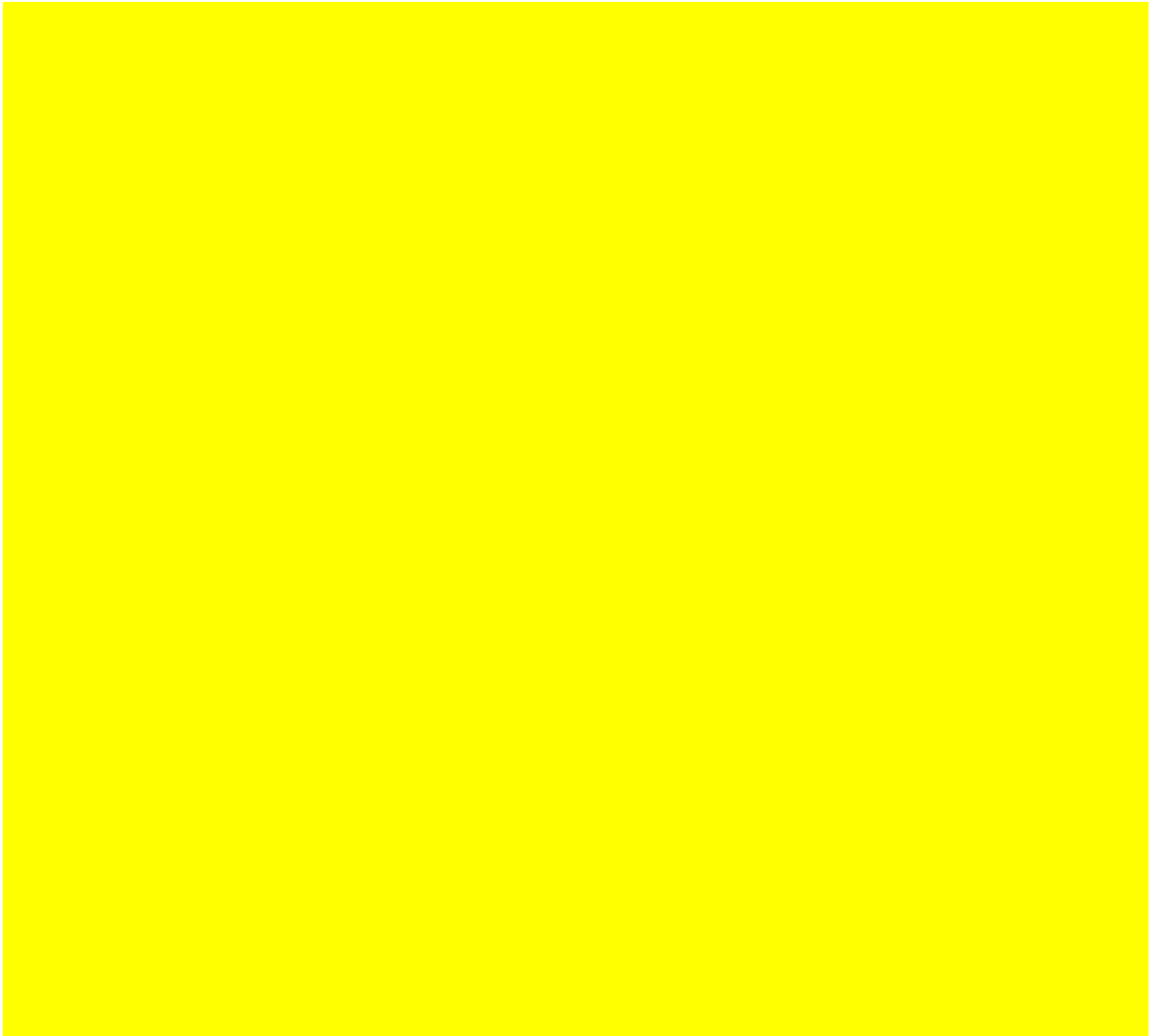
In the Matter of:

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 )

## **CONFIDENTIAL RESPONSE**

to PSC 1-4.b.iv of the Commission's Request for Information  
dated March 31, 2022  
FILED: April 14, 2022

INFORMATION SUBMITTED WITH  
MOTION FOR CONFIDENTIAL TREATMENT



**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 Item 5) *List each oral coal supply solicitation issued during the period*  
2 *under review.*

3 a. *For each solicitation, state why the solicitation was not written, the*  
4 *date(s) of the solicitation, the quantities solicited, a general*  
5 *description of the quality of coal solicited, the period over which*  
6 *deliveries were requested, and the generating unit(s) for which the*  
7 *coal was intended.*

8 b. *For each solicitation, identify all vendors solicited and the vendor*  
9 *selected. Provide the tabulation sheet or other document that ranks*  
10 *the proposals. (This document should identify all vendors who*  
11 *made offers.) State the reasons for each selection. For each lowest-*  
12 *cost bid not selected, explain why the bid was not selected.*

13

14

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1 **Response)**

2 E-Mails (Spot Solicitation)

3 a.

4 i. Date solicitation issued: October/November 2021.

5 ii. Type of solicitation: Spot.

6 iii. Quantities solicited: Inquire tonnage availability.

7 iv. Quality of coal and petroleum coke solicited: No specifics – inquiry for  
8 availability only.

9 v. Time period over which deliveries were requested: November 2021-March  
10 2022.

11 vi. Generating units for coal intended use: R.D. Green and/or D. B. Wilson.

12 b. Twelve (12) suppliers were contacted by email solicitations. Of the twelve,  
13 five (5) had coal supplies available; all five were awarded contracts.  
14 Natural gas prices were rising and coal was scarce. Coal fired units were  
15 running at high demand. The table on the following page details the results  
16 of the solicitation.

17


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1

<b>Big Rivers Electric Corporation Summary of E-Mail Inquiries May 1, 2021, through October 31, 2021</b>				
<b>Vendor</b>	<b>Tonnage</b>	<b>Price</b>	<b>Contract Number</b>	<b>Effective Date</b>
				

2

3 **Witness)** Vicky L. Payne

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1 **Item 6)** *For the period under review, list each vendor from whom natural*  
2 *gas was purchased for generation and the quantities and the nature of each*  
3 *purchase (i.e., spot or contract).*

4

5 **Response)** Please see the listing on the following page for vendors from whom  
6 natural gas was purchased for generation and the quantity and nature of each  
7 purchase from May 1, 2021, through October 31, 2021. Also on the following page  
8 please see the percentage of purchases that were either spot versus contract for the  
9 period under review in total.

10 Starting in July 2010, Big Rivers began purchasing natural gas under a North  
11 American Energy Standard Board ("NAESB") base contract for sale and purchase of  
12 natural gas. Actual purchases of gas are made using transaction confirmations that  
13 are governed by the NAESB contract. Big Rivers also entered into a contract with  
14 Texas Gas Transmission, LLC for the transportation and storage and borrowing of  
15 gas to Big Rivers' delivery point, the Reid Combustion Turbine. All of these contracts  
16 are on file with the Kentucky Public Service Commission.

17

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1

**For the Period from May 1, 2021, through October 31, 2021**

<b>Purchase Vendor</b>	<b>Fuel Type</b>	<b>MCF</b>	<b>Contract Type</b>
CIMA Energy, LTD	Natural Gas	49,186.00	Spot
Tenaska Marketing Ventures	Natural Gas	2,000.00	Spot
		<u>51,186.00</u>	

**For the Period from May 1, 2021, through October 31, 2021**

Percentage Spot	100.00 %
Percentage Contract	<u>0.00 %</u>
Percentage Total	<u>100.00 %</u>

2

3

4 **Witness)** Vicky L. Payne

5

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1 Item 7) *For the period under review, state whether there were any*  
2 *instances in which a natural gas generating unit could not be operated when*  
3 *it otherwise would have run due to pipeline constraints or natural gas being*  
4 *unavailable.*

5

6 **Response)** There were no instances during this review period that Big Rivers' gas  
7 generating unit could not be operated when it otherwise would have run, due to  
8 pipeline constraints or natural gas being unavailable.

9

10

11 **Witness)** Vicky L. Payne

12

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1 **Item 8)**      *State whether there have been any changes to hedging activities*  
2 *for coal or natural gas purchases used for generation since the previous FAC*  
3 *review proceeding. If so, describe the changes in detail.*

4

5 **Response)** Big Rivers does not engage in financial hedging activities regarding its  
6 coal or natural gas purchases used for generation. Big Rivers does, however, stagger  
7 its purchases of coal to create a natural hedge on price volatility pursuant to Policy  
8 No. 111 – Hedge Policy. There have been no changes to these hedging activities since  
9 the previous FAC review.

10

11

12 **Witness)**      Vicky L. Payne

13



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- 1 **Item 9)**      *State whether BREC has audited any of its fuel or transportation*  
2 *contracts during the period under review. If so, for each audited contract:*  
3      *a. Identify the contract;*  
4      *b. Identify the auditor; and*  
5      *c. State the results of the audit, and describe the actions that BREC took as*  
6      *a result of the audit.*

7  
8 **Response)**

- 9      a. Big Rivers has audited one of its coal supply source mine operations during  
10      the review period: ACNR's Pride<sup>4</sup> mining operation (BRE-20-001A) on  
11      September 28, 2021. Big Rivers has not audited any of its transportation  
12      contracts during that same time period.  
13      b. Associated Engineers, Inc. of Madisonville, Kentucky ("Associated  
14      Engineers") conducted the mine review.  
15      c. Big Rivers requested a mine engineering review of ACNR's Pride mining  
16      operation to assess its ability to meet tonnage requirements. Associated

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<sup>4</sup> ACNR = American Consolidated Natural Resources, Inc.

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1 Engineers reported the mine experiencing geologic issues on one unit  
2 causing reduced production. The mine also experienced personnel issues  
3 related to COVID and, therefore, could not fully staff mining operations.  
4 Big Rivers discussed these is issues with ACNR. Mining operations were  
5 moved to a better, more productive, geological location to produce better  
6 contract quality and to meet tonnage requirements. ACNR and Big Rivers  
7 agreed any option tonnage shortfall would carry forward until complete.

8

9

10 **Witness)** Vicky L. Payne

11

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1 **Item 10)**

2 **a. State whether BREC is currently involved in any litigation with its**  
3 **current or former fuel suppliers or transportation vendors. If so, for**  
4 **each litigation:**

5 **(1) Identify the supplier or vendor;**

6 **(2) Identify the contract involved;**

7 **(3) State the potential liability or recovery to BREC;**

8 **(4) List the issues presented; and**

9 **(5) Provide a copy of the complaint or other legal pleading that**  
10 **initiated the litigation and any answers or counterclaims. If**  
11 **a copy has previously been filed with the Commission, provide**  
12 **the date on which it was filed and the case in which it was**  
13 **filed.**

14 **b. State the current status of all litigation with suppliers or vendors.**

15

16

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1 **Response)**

2 a. Big Rivers is not currently involved in any litigation with its current or  
3 former fuel suppliers or transportation vendors.

4 b. (1) – (5)

5 Not applicable.

6 c. Not applicable.

7

8

9 **Witness)** Vicky L. Payne

10

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1 **Item 11)**

2 ***a. For the period under review, state whether there have been any***  
3 ***changes to BREC's written policies and procedures regarding its***  
4 ***fuel procurement. If yes:***

5 ***(1) Describe the changes;***

6 ***(2) Provide the written policies and procedures as changed;***

7 ***(3) State the date(s) the changes were made; and***

8 ***(4) Explain why the changes were made.***

9 ***b. If no, provide the date BREC's current fuel procurement policies and***  
10 ***procedures were last changed, provide the date when they were last***  
11 ***provided to the Commission, and identify the proceeding in which***  
12 ***they were provided.***

13

14

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1 **Response)**

2 a. Yes, during the period under review, *i.e.*, May 1, 2021, through October 31,  
3 2021, Big Rivers made changes to Policy No. 120 – Fuel Procurement  
4 Policies and Procedures.  
5 (1) through (4)

6

7 Policy No. 120 – Fuel Procurement Policies and Procedures

8 On September 17, 2021, Big Rivers changed the title of ‘Director’ to  
9 ‘Manager’ throughout the policy.

10

11 A copy of Policy No. 120 is attached to this response along with a  
12 redline mark-up thereof showing the changes from the prior version.

13 b. Big Rivers’ other fuel procurement policies and procedures were not  
14 changed during the period under review, *i.e.*, May 1, 2021, through October  
15 31, 2021. In the table on the following page, Big Rivers lists these other  
16 written policies and procedures regarding fuel procurement, the date of

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1 their last changes, and the proceedings in which Big Rivers provided them  
2 to the Commission.

3

<b>Big Rivers Electric Corporation Policies and Procedures for Fuel Procurement</b>				
<b>Number</b>	<b>Name</b>	<b>Date Last Change</b>	<b>Provided In</b>	<b>Date Provided</b>
105	Energy-Related Transaction Authority Policy	2020-11-20	Case No. 2021-00297	2021-09-21
105	Appendix A: Energy-Related Transaction Authority Policy	2020-03-17	Case No. 2020-00250	2020-09-02
111	Hedge Policy	2020-08-21	Case No. 2021-00058	2021-03-22
121	Solid Fuel Inventory Policy	2019-08-16	Case No. 2020-00009	2020-02-25
122	Energy-Related Transaction Credit Policy	2017-11-17	Case No. 2018-00221	2018-08-24

4

5

6 **Witness)** Vicky L. Payne

7

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>09/17/2021</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>09/17/2021</b>	

Policy Purpose

The purpose of Big Rivers Electric Corporation (“Big Rivers”) Fuel Procurement Policies and Procedures is to present the principles that govern the procurement of fuel, reagent, and associated transportation. This policy is not intended to provide a step-by-step procedural flow, but place an emphasis on procurement policies and a concise overview of appropriate procurement practices. The awarding of Contracts and Purchase Orders will comply with business controls including corporate governance, authority limit matrices, auditing recommendations, and other established practices and limitations.

**FUEL PROCUREMENT POLICIES AND PROCEDURES**

**A. Definitions:**

1. "Agreement" means a legally binding document, in which one party agrees to sell and the other agrees to buy fuel, reagent, or transportation services for such, which is executed by both Buyer and Seller.
2. "Award Recommendation" means Big Rivers’ approval process for the review and approval by Senior Management of a recommended fuel, reagent, or transportation purchase that fall outside the limits established in Big Rivers’ granted authority limits outlined in the Energy Related Transaction Authority Policy (Board Policy 105).
3. "Contract" is an Agreement, Letter Agreement, Purchase Order, or Spot Contract for fuel supply, reagent, or such transportation with certain terms and conditions that describe the business transaction under which the Company procures fuel, reagent, and related transportation.
4. "Contract purchase" means any purchase of fuel, reagent, or transportation on behalf of the Company under a contract, typically more than one year’s duration.
5. "Department" means the Big Rivers’ Fuels Procurement Department.
6. "Manager" means the Big Rivers’ Manager Fuels Procurement.
7. “Emergency” means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments and other problems affecting the production or transportation of fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that could be reasonably foreseen as impairing the continued supply of fuel to Big Rivers facilities.
8. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Big Rivers’ generating units.
9. "Fuel" means combustibles purchased by Big Rivers for one or more of its generating stations.
10. "VP Production” means Big Rivers’ principal individual responsible for power generation and fuel procurement, among other duties.



<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>09/17/2021</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>09/17/2021</b>	

11. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
12. "Spot Contract" is a type of agreement that may be issued by Big Rivers for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
13. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of Big Rivers where the terms and conditions are incorporated in the Letter Agreement, Purchase Order or Spot Contract and the term is typically of one year or less.
14. "Station" means one of Big Rivers' generating facilities.
15. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
16. "Unit" means a generating unit at a station.
17. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

**B. Fuel Procurement Policies:**

This policy provides guidance to ensure an adequate supply of fuel and reagent of sufficient quality at the most competitive overall evaluated cost on a unit bus bar basis consistent with Big Rivers' obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. Big Rivers will use its best efforts to secure its fuel and reagent supply at competitive prices through solicitation for such.

Implementation of this policy is of highest priority to Big Rivers. The Department shall be organized and staffed, and fuel procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with this policy. Fuel, reagent, and related transportation shall be purchased at competitive prices considering all material factors. The factors include but are not limited to: quantity needed to maintain an adequate supply, quality necessary to ensure generating unit operating and maintenance characteristics and environmental standards, reliability of the supplier, creditworthiness, and forward planning to meet projected system requirements, and meeting emergency or other unusual circumstances that might affect operating conditions. From time to time, the Manager will review this policy and recommend updates as appropriate.

**C. Organization:**

1. Department Structure. The Department shall be organized and staffed to effectively administer Big Rivers' fuel procurement function.

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>09/17/2021</b>	Approved by <b>BOARD</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>09/17/2021</b>	

2. Organizational Responsibility. The VP Production to whom the Manager reports, has the responsibility for fuel procurement. The Manager is responsible for the Department. Other departments may be called upon by the Department to the extent the Manager or VP Production considers advisable in the execution of the functions of the Department.
  
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the Manager which is specified in the Energy Related Transaction Authority Policy (Board Policy 105). The Award Recommendation will be drafted by the Manager. Contractual agreements and amendments for procurement shall be reviewed by legal counsel, and executed by the VP Production within the authority granted by Appendix A to the Energy Related Transaction Authority Policy (Board Policy 105). Greater expenditures shall require the signature of Big Rivers' President and Chief Executive Officer when such expenditure is within his trading authority as established by the Board of Directors ("Board"). These levels of authority may be amended, supplemented, or superseded as dictated by Big Rivers.
  
4. Reports. The Manager will instruct the Department to prepare, maintain and distribute reports to management and others as deemed necessary for business operations and regulatory requirements.
  
5. Records. The Department shall maintain the following records:
  - a. Open Contract Files. The Department shall maintain the following on open status for at least one-year or longer as the contract term or other conditions warrant:
    1. For each current contract supplier, the files will contain:
      - a) Contract documents, amendments, purchase orders and escalation documentation;
      - b) General correspondence;
      - c) Invoices and invoice verification data;
      - d) Delivery records and quality analyses data;
      - e) Inspection reports and other data.
    2. A record of transportation equipment owned or leased by Big Rivers (as applicable).
    3. A list containing current suppliers and known potential Suppliers of fuel.
  - b. Closed Contract Files. The Department shall maintain its files according to Big Rivers' record retention plan.
  
6. General Administrative Duties. The Department shall subscribe to and have membership in appropriate trade and industry publications and/or associations, to include reports of governmental or consulting agencies concerning fuel, reagent, and related transportation market information, to include fuel prices and/or projections. Department personnel shall use their best efforts to keep current with fuel market conditions, prices and availability, and other developments relating to fuel procurement.

<b>Fuel Procurement Policies and Procedures</b>				
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**D. Fuel Supply Procedures:**

1. Projections. In conjunction with other departments of Big Rivers, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in Big Rivers' planning process.
2. Contract/Spot Mix. Subject to the approval of the VP Production, the Manager shall determine whether a contract purchase is advisable, considering the following factors: (a) the availability of adequate supplies from qualified suppliers, (b) the advisability or need to have an adequate supply committed for an existing or planned unit (subject to inventory limits specified by Big Rivers), (c) the desire to maintain practical flexibility as to market conditions and other factors affecting price and availability, (d) existing and anticipated environmental standards, (e) such other factors as may reasonably affect the implementation of this policy and (f) fuel impact on generation facilities' operation and maintenance.
3. Current Requirements. The Department shall review and analyze the data available to the Department for purposes of conducting fuel and reagent purchases in a timely manner to meet the requirements of Big Rivers.
4. Supplier Qualifications. Big Rivers shall select potential suppliers on the basis of evaluation, market intelligence, performance information (as available), industry research, and creditworthiness, as determined by the Manager and staff. No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

A supplier evaluation (to include site visit and mine engineering and/or performance report) may be performed to determine if a supplier has the ability to deliver in the time frame requested the quantity and quality of coal or reagent bid at the offered price.

5. Solicitations. The Department shall maintain a current list of Suppliers and shall review that list from time to time to ensure that it remains current. Normally, Big Rivers shall purchase its fuel and reagent through sealed bid solicitations; however, Big Rivers reserves the right to utilize its market intelligence to seize opportunity purchases of fuels and reagent, request oral, written, or electronic offers, potentially followed by negotiations, when in its judgment market conditions provide an opportunity to obtain fuel or reagent more advantageously than through mailed bid solicitations and usual procedures. When Big Rivers foregoes the solicitation process, documentation shall be appended to the resulting purchase order file describing the conditions. A notice of a request for quotation ("RFQ") shall be provided to normal industry newsletters and information postings. The normal solicitation process shall require that potential suppliers be notified in writing as to the general quantities, terms and quality specifications required. An RFQ number will be assigned to for the quotation package. An RFQ will include: instructions to bidders (date and time due); scope of supply (quantity and quality); potential term; standard terms and conditions of typical agreements.

Offers from potential suppliers shall be returned by the requested date and time or they will be rejected. A bid log shall be kept for logging in receipt of bid offers. Attendees viewing the

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opening of the bid shall initial the bid document as opened and the log as at the completion of the opening. Offers shall be opened and logged in the presence of the VP Production and Manager or their representative in their absence, and another selected representative outside of the Department.

All appropriate bid data shall be documented and electronically categorized for the process of evaluation of the various offerings of fuel and reagent. The documents shall be maintained in a secured area and shall be kept pursuant to normal record keeping practices.

6. Contract Awards. The Department shall review and analyze each Contract offer. The Manager, or his/her representative, may engage in preliminary negotiations to determine which offers warrant further consideration. The Manager and/or representative shall investigate the potential supplier and proposed source of supply; and, as to any offer for fuel, the Department shall verify the adequacy of the proposed source of supply as to quantity, quality, and timely deliverability.

The evaluation shall include, but not necessarily be limited to, the response to the RFQ (items required by the RFQ for satisfactory operational, environmental, and economic criteria); diversity of supply; supplier credit assessment; transportation mode and cost; and diversity of suppliers to provide the lowest evaluated cost of electrical energy to the Unit bus bar over the long term consistent with Kentucky Public Service Commission regulations.

From this initial evaluation, a select group of potential suppliers (a “short-list”) of suppliers shall be developed for more in-depth evaluation. The Department may then engage in preliminary discussions to ensure that the offer warrants further evaluation and consideration. The objective of the negotiating discussions is to ensure that Big Rivers achieves balanced terms and conditions and the lowest evaluated electrical energy delivered to the Unit bus bar and reliable supply consistent with other qualifiers related to supplier reliability, environmental restraints, transportation options, legal requirements, etc.

The recommended Supplier(s) shall be selected based upon the evaluation criteria and the results of the negotiating discussions. The Department shall prepare a detailed Award Recommendation for approval. The Award Recommendation shall document the selection criteria and pertinent factors, and in circumstances where more than one company is selected, the recommendation shall describe the tonnage requirements and other responsibilities of each of the other recommended Suppliers.

All contracts for which the term, tenor or notional amount exceed the limits specified for the Manager must be approved and signed by individual(s) authorized per the Energy Related Transaction Authority Policy (Board Policy 105).

7. Spot Purchases. Spot purchases may be made by Big Rivers whenever considered advisable by the Manager in furtherance of Big Rivers’ fuel and reagent needs, subject to the limit of authority as outlined by Energy Related Transaction Authority Policy (Board Policy 105).
8. Documentation. Contracts shall be signed by a duly appointed officer of the Supplier and an Officer of Big Rivers. A purchase order may be issued for a spot purchase. A purchase order

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shall contain all terms of that purchase. Further, the Department shall maintain documentation of the final list (log) of bidders, a copy of the entire bid package; bidder's responses; and the bid evaluation summary used for decision support.

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**E. Fuel Supply and Reagent Agreement Administration:**

1. Compliance. The Department shall review and analyze daily business and operational reports to properly administer all fuel and transportation agreements.
2. Coal weights. Coal weights shall be obtained by either Big Rivers or by Supplier, upon agreement by Big Rivers. Coal weight is obtained by scale or draft method, depending upon Big Rivers' site or methodology employed by Supplier to ascertain weights. In either event, coal weights are obtained by industry-accepted standards, and in cases where scales are utilized, are duly tested and maintained in proper order for such purpose. In cases where draft weights are utilized, Big Rivers employs processes to verify actions to obtain draft weights and that such measures are by industry-accepted standards. Coal quantity is obtained by Station personnel and reported through the fuels information system or is provided by the Supplier pursuant to the contract agreement.
3. Coal sampling. Coal sampling and analysis shall be performed by either Big Rivers or the Supplier, upon agreement by Big Rivers. Coal sampling and analysis shall be performed according to procedures adopted by Big Rivers' laboratory in accordance with A.S.T.M. standards for coal sampling, coal sample preparation, coal sample identification, handling of sample, and coal analysis. Coal quality is assessed and reported through the fuels information system by Big Rivers' laboratory personnel or is provided by the Supplier pursuant to the contract agreement.
4. Amendments. A contract shall not be materially amended except after analysis by the Department and recommendation of the Director or the VP Production. No material contract or purchase order addendum shall be made except upon legal review of such amendment, recommendation of the Manager and the approval of the VP Production pursuant to the limits of the Energy Related Transaction Authority Policy (Board Policy 105). Material amendments to contracts that were originally approved by the Board shall also be approved by the Board.
5. Contract Administration. The Manager and the Department shall remain informed as to the terms and conditions of each current contract, and maintain the necessary data to administer the contracts. Every supplier request for a change in terms, conditions, or prices must be written and supported by adequate data in conformity with the contract. Each such request shall be analyzed by the Department against the contract provisions, and reported with recommendations to the

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Manager. After review by the Manager, the supplier request and Department's recommendations shall be approved as required by Big Rivers. If any request is not approved in whole or in part, the Manager shall advise the supplier, specifying Big Rivers' objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Big Rivers as dictated by contract terms shall be the primary method of resolving the issue.

6. Force Majeure. A supplier's claim for relief from compliance with fuel supply agreement terms due to force majeure conditions must be in writing with an adequate description of conditions warranting nonperformance. Each force majeure claim shall be reviewed by the Manager and Big Rivers' legal counsel.
7. Inspections. The Manager shall request inspections of mining and other facilities of a contract fuel and/or reagent supplier or other facilities as required or deemed necessary to manage the performance and contractual relationship (Contract Administration).

**F. Fuel and Reagent Supply Agreement Enforcement:**

1. General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by Big Rivers in a reasonable, fair, and practical manner to achieve supplier compliance with Big Rivers' overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
2. Manager Responsibility. Whenever it is determined that a shipment does not meet Fuel Supply or Reagent Agreement terms, the Manager, or designee, shall inform the supplier and direct that subsequent shipments be in compliance. When necessary the VP Production and the Manager may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
3. Legal Assistance. The Department shall have access to, and shall receive advice from, legal counsel as provided by Big Rivers on any matter relating to fuel, reagent, and related transportation procurement, contracts and amendments thereto, administration, and enforcement. Should a dispute as to a supplier's performance fail to be satisfactorily resolved by the Manager, the matter shall be referred to legal counsel. Legal counsel may consider further negotiation, arbitration (if provided by the contract), or litigation. No arbitration or litigation shall commence except on the advice of said counsel with approval by Senior Management.

**G. Inventory Levels:**

Big Rivers has an obligation to ensure continuous low cost, reliable service to its Member-Owners. Decisions affecting fuel inventory shall consider these obligations.

Big Rivers shall maintain an adequate inventory while allowing for enough flexibility to permit inventory levels to be responsive to known and anticipated changes in conditions in an attempt to avoid risks and stoppages due to unforeseen conditions. Inventory shall be recommended based upon, but not limited to, supplier performance, environmental conditions, labor matters, logistical issues and concerns, and generation requirements and dispatch. The general level of inventory



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shall be monitored for such matters and recommendations to adjust inventory to meet anticipated conditions shall be made from time to time. Such inventory recommendations shall be made by the Manager for approval by Senior Management and shall be in accordance with or modify concurrently Solid Fuel Inventory Policy (Board Policy 121).

Solid fuel inventories and reagent shall be monitored and reported regularly via Big Rivers' fuel information system(s).

**H. Emergency Procurement:**

Any one or more of the procedures described herein may be waived by the VP Production, when, in the informed judgment of the Manager, and on his recommendation, fuel must be purchased without complying with one or more of such provisions due to extraordinary conditions including strikes, lockouts or other labor problems affecting fuel production, embargoes, mining or other problems affecting production or transportation, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of fuel and reagent to Big Rivers from its existing suppliers. When such a purchase is made, documentation of circumstances will be appended to the purchase order and/or contract file.

**I. Transportation Services Contracts:**

Transportation services bids shall be requested and Contracts negotiated whenever appropriate. Consideration shall be given to plant requirements, supplier loading capabilities, relative location of supplier to Stations, transportation mix, unloading capabilities and capacities at Stations, logistic constraints, transportation provider economics, Station material handling economics, and any other factor which might affect the delivery of Fuel and reagent to the Stations.

Unless otherwise dictated by Emergency situations, the Solicitation process will be utilized for transportation services. The selection of transportation provider will generally be based upon, but not necessarily limited to cost, reliability, insurance, past / current performance, container availability and suitability for purpose, material handling capacities and constraints, transportation mix, and any other mitigating factors in terms of logistics.

All transportation service agreements shall be in written contractual form duly executed by an authorized supplier of service and Big Rivers.

**J. Ethics and Conduct:**

Big Rivers recognizes the importance of following appropriate business ethics to guide the conduct of the Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of Big Rivers including, but not limited to, the Board of Directors Ethics Policy (Board Policy 102) and the Conflicts of Interest Policy (Board Policy 108) for Big Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.

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Fuels staff shall endeavor to serve the best interests of Big Rivers, its Member-Owners, and stakeholders in the performance of their duties and responsibilities.

<b>Number</b>	<b>Date</b>	<b>Notes</b>	<b>Approved by</b>
<b>Original</b>	12/21/2007	Approved to be effective at close of unwind	Board
<b>Rev 1</b>	03/16/2012	Update out of date language and staffing changes	Board
<b>Rev 2</b>	03/14/2013	Update due to title change	
<b>Rev 3</b>	03/21/2014	Add date last reviewed line, section header and change “mmBTU” to “gallon”	Board
<b>Rev 4</b>	09/19/2014	Change Chief Operating Officer to VP Production	Board
<b>Rev 5</b>	08/21/2015	Add reference to Board Policy 105 – Energy Related Transaction Authority and Board Policy 121 – Solid Fuel Inventory; general clean up	Board
<b>Rev 6</b>	09/16/2016	Unified all references to Big Rivers Electric Corporation to Big Rivers, clarified policy references, minor wording change	Board
<b>Rev 7</b>	08/10/2018	Removed negotiating team from the process for preparing Award Recommendations	Board
<b>Rev 8</b>	08/16/2019	Added PSC regulations to contract awards and modified amendments to material amendments for requiring Board approval; general clean up	Board
<b>Rev 9</b>	08/21/2020	Change VP Production to Executive Vice President of Operations	Board
<b>Rev 10</b>	06/02/2021	Change Executive Vice President of Operations to VP Production (CEO authority per Board Policy 103)	CEO
<b>Rev 11</b>	09/17/21	Change Director to Manager	Board



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Policy Purpose

The purpose of Big Rivers Electric Corporation (“Big Rivers”) Fuel Procurement Policies and Procedures is to present the principles that govern the procurement of fuel, reagent, and associated transportation. This policy is not intended to provide a step-by-step procedural flow, but place an emphasis on procurement policies and a concise overview of appropriate procurement practices. The awarding of Contracts and Purchase Orders will comply with business controls including corporate governance, authority limit matrices, auditing recommendations, and other established practices and limitations.

**FUEL PROCUREMENT POLICIES AND PROCEDURES**

**A. Definitions:**

1. "Agreement" means a legally binding document, in which one party agrees to sell and the other agrees to buy fuel, reagent, or transportation services for such, which is executed by both Buyer and Seller.
2. "Award Recommendation" means Big Rivers’ approval process for the review and approval by Senior Management of a recommended fuel, reagent, or transportation purchase that fall outside the limits established in Big Rivers’ granted authority limits outlined in the Energy Related Transaction Authority Policy (Board Policy 105).
3. "Contract" is an Agreement, Letter Agreement, Purchase Order, or Spot Contract for fuel supply, reagent, or such transportation with certain terms and conditions that describe the business transaction under which the Company procures fuel, reagent, and related transportation.
4. "Contract purchase" means any purchase of fuel, reagent, or transportation on behalf of the Company under a contract, typically more than one year’s duration.
5. "Department" means the Big Rivers’ Fuels Procurement Department.
6. "~~Manager~~Director" means the Big Rivers’ ~~Manager~~Director Fuels Procurement.
7. “Emergency” means extraordinary conditions affecting fuel production, transportation, or usage, including but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments and other problems affecting the production or transportation of fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that could be reasonably foreseen as impairing the continued supply of fuel to Big Rivers facilities.
8. "Environmental standards" mean the legal requirements for compliance with emission levels or other environmental requirements applicable to one or more of the Big Rivers’ generating units.
9. "Fuel" means combustibles purchased by Big Rivers for one or more of its generating stations.
10. “VP Production” means Big Rivers’ principal individual responsible for power generation and fuel procurement, among other duties.

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11. "Solicitation" means the process of soliciting bids (written or oral) for the supply of fuel, reagent, and/or related transportation services.
12. "Spot Contract" is a type of agreement that may be issued by Big Rivers for the supply of fuel, reagent, or related transportation of such with a term of typically one year or less.
13. "Spot Purchase" means any purchase of fuel, reagent, or related transportation on behalf of Big Rivers where the terms and conditions are incorporated in the Letter Agreement, Purchase Order or Spot Contract and the term is typically of one year or less.
14. "Station" means one of Big Rivers' generating facilities.
15. "Supplier" means the seller or counterparty to an agreement who is obligated to comply with and fulfill the agreement's terms and conditions.
16. "Unit" means a generating unit at a station.
17. "Unit bus bar cost" is the total variable production cost including the maintenance cost associated with burning the fuel.

**B. Fuel Procurement Policies:**

This policy provides guidance to ensure an adequate supply of fuel and reagent of sufficient quality at the most competitive overall evaluated cost on a unit bus bar basis consistent with Big Rivers' obligations to provide adequate and reliable service to its customers, to meet operational and environmental standards, and to meet any other applicable legal requirements. Big Rivers will use its best efforts to secure its fuel and reagent supply at competitive prices through solicitation for such.

Implementation of this policy is of highest priority to Big Rivers. The Department shall be organized and staffed, and fuel procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with this policy. Fuel, reagent, and related transportation shall be purchased at competitive prices considering all material factors. The factors include but are not limited to: quantity needed to maintain an adequate supply, quality necessary to ensure generating unit operating and maintenance characteristics and environmental standards, reliability of the supplier, creditworthiness, and forward planning to meet projected system requirements, and meeting emergency or other unusual circumstances that might affect operating conditions. From time to time, the ~~Manager~~ Director will review this policy and recommend updates as appropriate.

**C. Organization:**

1. Department Structure. The Department shall be organized and staffed to effectively administer Big Rivers' fuel procurement function.

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2. Organizational Responsibility. The VP Production to whom the ~~ManagerDirector~~ reports, has the responsibility for fuel procurement. The ~~ManagerDirector~~ is responsible for the Department. Other departments may be called upon by the Department to the extent the ~~ManagerDirector~~ or VP Production considers advisable in the execution of the functions of the Department.
  
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all fuel purchases that exceed the term, tenor, or notional amount of authority of the ~~ManagerDirector~~ which is specified in the Energy Related Transaction Authority Policy (Board Policy 105). The Award Recommendation will be drafted by the ~~ManagerDirector~~. Contractual agreements and amendments for procurement shall be reviewed by legal counsel, and executed by the VP Production within the authority granted by Appendix A to the Energy Related Transaction Authority Policy (Board Policy 105). Greater expenditures shall require the signature of Big Rivers' President and Chief Executive Officer when such expenditure is within his trading authority as established by the Board of Directors ("Board"). These levels of authority may be amended, supplemented, or superseded as dictated by Big Rivers.
  
4. Reports. The ~~ManagerDirector~~ will instruct the Department to prepare, maintain and distribute reports to management and others as deemed necessary for business operations and regulatory requirements.
  
5. Records. The Department shall maintain the following records:
  - a. Open Contract Files. The Department shall maintain the following on open status for at least one-year or longer as the contract term or other conditions warrant:
    1. For each current contract supplier, the files will contain:
      - a) Contract documents, amendments, purchase orders and escalation documentation;
      - b) General correspondence;
      - c) Invoices and invoice verification data;
      - d) Delivery records and quality analyses data;
      - e) Inspection reports and other data.
    2. A record of transportation equipment owned or leased by Big Rivers (as applicable).
    3. A list containing current suppliers and known potential Suppliers of fuel.
  - b. Closed Contract Files. The Department shall maintain its files according to Big Rivers' record retention plan.
  
6. General Administrative Duties. The Department shall subscribe to and have membership in appropriate trade and industry publications and/or associations, to include reports of governmental or consulting agencies concerning fuel, reagent, and related transportation market information, to include fuel prices and/or projections. Department personnel shall use their best efforts to keep current with fuel market conditions, prices and availability, and other developments relating to fuel procurement.

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**D. Fuel Supply Procedures:**

1. Projections. In conjunction with other departments of Big Rivers, the Department shall prepare annually a projection of fuel usage and cost at each Station for the number of years required for use in Big Rivers' planning process.
2. Contract/Spot Mix. Subject to the approval of the VP Production, the ~~Manager~~~~Director~~ shall determine whether a contract purchase is advisable, considering the following factors: (a) the availability of adequate supplies from qualified suppliers, (b) the advisability or need to have an adequate supply committed for an existing or planned unit (subject to inventory limits specified by Big Rivers), (c) the desire to maintain practical flexibility as to market conditions and other factors affecting price and availability, (d) existing and anticipated environmental standards, (e) such other factors as may reasonably affect the implementation of this policy and (f) fuel impact on generation facilities' operation and maintenance.
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A supplier evaluation (to include site visit and mine engineering and/or performance report) may be performed to determine if a supplier has the ability to deliver in the time frame requested the quantity and quality of coal or reagent bid at the offered price.

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The evaluation shall include, but not necessarily be limited to, the response to the RFQ (items required by the RFQ for satisfactory operational, environmental, and economic criteria); diversity of supply; supplier credit assessment; transportation mode and cost; and diversity of suppliers to provide the lowest evaluated cost of electrical energy to the Unit bus bar over the long term consistent with Kentucky Public Service Commission regulations.

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3. Coal sampling. Coal sampling and analysis shall be performed by either Big Rivers or the Supplier, upon agreement by Big Rivers. Coal sampling and analysis shall be performed according to procedures adopted by Big Rivers' laboratory in accordance with A.S.T.M. standards for coal sampling, coal sample preparation, coal sample identification, handling of sample, and coal analysis. Coal quality is assessed and reported through the fuels information system by Big Rivers' laboratory personnel or is provided by the Supplier pursuant to the contract agreement.

4. Amendments. A contract shall not be materially amended except after analysis by the Department and recommendation of the Director or the VP Production. No material contract or purchase order addendum shall be made except upon legal review of such amendment, recommendation of the ~~Manager~~Director and the approval of the VP Production pursuant to the limits of the Energy Related Transaction Authority Policy (Board Policy 105). Material amendments to contracts that were originally approved by the Board shall also be approved by the Board.

5. Contract Administration. The ~~Manager~~Director and the Department shall remain informed as to the terms and conditions of each current contract, and maintain the necessary data to administer the contracts. Every supplier request for a change in terms, conditions, or prices must be written



<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>089/2117/20210</b>	Approved by
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>096/1702/20219</b>	<b>BOARD</b>

and supported by adequate data in conformity with the contract. Each such request shall be analyzed by the Department against the contract provisions, and reported with recommendations to the ManagerDirector. After review by the ManagerDirector, the supplier request and Department's recommendations shall be approved as required by Big Rivers. If any request is not approved in whole or in part, the ManagerDirector shall advise the supplier, specifying Big Rivers' objections with an adequate explanation. If the supplier's request is not approved, negotiation between the supplier and Big Rivers as dictated by contract terms shall be the primary method of resolving the issue.

6. Force Majeure. A supplier's claim for relief from compliance with fuel supply agreement terms due to force majeure conditions must be in writing with an adequate description of conditions warranting nonperformance. Each force majeure claim shall be reviewed by the ManagerDirector and Big Rivers' legal counsel.
7. Inspections. The ManagerDirector shall request inspections of mining and other facilities of a contract fuel and/or reagent supplier or other facilities as required or deemed necessary to manage the performance and contractual relationship (Contract Administration).

**F. Fuel and Reagent Supply Agreement Enforcement:**

1. General Enforcement Policy. Supplier obligations under Fuel or Reagent Supply Agreements shall be enforced by Big Rivers in a reasonable, fair, and practical manner to achieve supplier compliance with Big Rivers' overall procurement policy and the continuing supply of fuel to meet current and anticipated system requirements.
2. ManagerDirector Responsibility. Whenever it is determined that a shipment does not meet Fuel Supply or Reagent Agreement terms, the ManagerDirector, or ~~his/her~~ designee, shall inform the supplier and direct that subsequent shipments be in compliance. When necessary the VP Production and the ManagerDirector may determine, or receive advice, as to further action needed to assure fuel or reagent supply agreement compliance.
3. Legal Assistance. The Department shall have access to, and shall receive advice from, legal counsel as provided by Big Rivers on any matter relating to fuel, reagent, and related transportation procurement, contracts and amendments thereto, administration, and enforcement. Should a dispute as to a supplier's performance fail to be satisfactorily resolved by the ManagerDirector, the matter shall be referred to legal counsel. Legal counsel may consider further negotiation, arbitration (if provided by the contract), or litigation. No arbitration or litigation shall commence except on the advice of said counsel with approval by Senior Management.

**G. Inventory Levels:**

Big Rivers has an obligation to ensure continuous low cost, reliable service to its Member-Owners. Decisions affecting fuel inventory shall consider these obligations.

Big Rivers shall maintain an adequate inventory while allowing for enough flexibility to permit inventory levels to be responsive to known and anticipated changes in conditions in an attempt to

<b>Fuel Procurement Policies and Procedures</b>				
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>089/2117/20210</b>	Approved by
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>096/1702/20219</b>	<b>BOARD</b>

avoid risks and stoppages due to unforeseen conditions. Inventory shall be recommended based upon, but not limited to, supplier performance, environmental conditions, labor matters, logistical issues and concerns, and generation requirements and dispatch. The general level of inventory shall be monitored for such matters and recommendations to adjust inventory to meet anticipated conditions shall be made from time to time. Such inventory recommendations shall be made by the ~~Manager~~~~Director~~ for approval by Senior Management and shall be in accordance with or modify concurrently Solid Fuel Inventory Policy (Board Policy 121).

Solid fuel inventories and reagent shall be monitored and reported regularly via Big Rivers' fuel information system(s).

**H. Emergency Procurement:**

Any one or more of the procedures described herein may be waived by the VP Production, when, in the informed judgment of the ~~Manager~~~~Director~~, and on his recommendation, fuel must be purchased without complying with one or more of such provisions due to extraordinary conditions including strikes, lockouts or other labor problems affecting fuel production, embargoes, mining or other problems affecting production or transportation, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of fuel and reagent to Big Rivers from its existing suppliers. When such a purchase is made, documentation of circumstances will be appended to the purchase order and/or contract file.

**I. Transportation Services Contracts:**

Transportation services bids shall be requested and Contracts negotiated whenever appropriate. Consideration shall be given to plant requirements, supplier loading capabilities, relative location of supplier to Stations, transportation mix, unloading capabilities and capacities at Stations, logistic constraints, transportation provider economics, Station material handling economics, and any other factor which might affect the delivery of Fuel and reagent to the Stations.

Unless otherwise dictated by Emergency situations, the Solicitation process will be utilized for transportation services. The selection of transportation provider will generally be based upon, but not necessarily limited to cost, reliability, insurance, past / current performance, container availability and suitability for purpose, material handling capacities and constraints, transportation mix, and any other mitigating factors in terms of logistics.

All transportation service agreements shall be in written contractual form duly executed by an authorized supplier of service and Big Rivers.

**J. Ethics and Conduct:**

Big Rivers recognizes the importance of following appropriate business ethics to guide the conduct of the Department in the performance of its duties and responsibilities. Fuels staff shall adhere to the ethical standards and policies of Big Rivers including, but not limited to, the Board of Directors Ethics Policy (Board Policy 102) and the Conflicts of Interest Policy (Board Policy 108) for Big



<b>Fuel Procurement Policies and Procedures</b>			
Original Effective Date	<b>07/16/2009</b>	Date Last Reviewed	<b>089/2117/20210</b>
Original Approval Date	<b>12/20/2007</b>	Date Last Revised	<b>096/1702/20219</b>
			Approved by <b>BOARD</b>

Rivers' Employees. Also, each contractual document shall denote that the contract was prepared and executed in ethical dealing.

Fuels staff shall endeavor to serve the best interests of Big Rivers, its Member-Owners, and stakeholders in the performance of their duties and responsibilities.

<b>Number</b>	<b>Date</b>	<b>Notes</b>	<b>Approved by</b>
<b>Original</b>	12/21/2007	Approved to be effective at close of unwind	Board
<b>Rev 1</b>	03/16/2012	Update out of date language and staffing changes	Board
<b>Rev 2</b>	03/14/2013	Update due to title change	
<b>Rev 3</b>	03/21/2014	Add date last reviewed line, section header and change "mmBTU" to "gallon"	Board
<b>Rev 4</b>	09/19/2014	Change Chief Operating Officer to VP Production	Board
<b>Rev 5</b>	08/21/2015	Add reference to Board Policy 105 – Energy Related Transaction Authority and Board Policy 121 – Solid Fuel Inventory; general clean up	Board
<b>Rev 6</b>	09/16/2016	Unified all references to Big Rivers Electric Corporation to Big Rivers, clarified policy references, minor wording change	Board
<b>Rev 7</b>	08/10/2018	Removed negotiating team from the process for preparing Award Recommendations	Board
<b>Rev 8</b>	08/16/2019	Added PSC regulations to contract awards and modified amendments to material amendments for requiring Board approval; general clean up	Board
<b>Rev 9</b>	08/21/2020	Change VP Production to Executive Vice President of Operations	Board
<b>Rev 10</b>	06/02/2021	Change Executive Vice President of Operations to VP Production (CEO authority per Board Policy 103)	CEO
<b><u>Rev 11</u></b>	<b><u>09/17/21</u></b>	<b><u>Change Director to Manager</u></b>	<b><u>Board</u></b>

**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 First Request for Information  
in the Appendix of the Commission's Order  
dated March 31, 2022**

**April 14, 2022**

1 **Item 12)** *For the period under review, list all firm power commitments for*  
2 *(a) purchases and (b) sales. This list shall identify the electric utility, the*  
3 *amount of commitment in megawatts, and the purpose of the commitment*  
4 *(i.e., peaking, emergency).*

5

6 **Response)**

7 (a) Purchases:

8 Big Rivers has a contract with Southeastern Power Administration  
9 ("SEPA") to purchase up to 178 MWs of energy. A force majeure, previously  
10 in effect due to dam safety issues on SEPA's Cumberland River System,  
11 ceased on January 1, 2020. The lifting of the force majeure raised Big  
12 Rivers' SEPA Cumberland hydropower allocation of dependable capacity  
13 from 154 MWs to 178 MWs.

14 Additional purchases are shown on the tables on the following pages.

15 Please note, the purchases listed were made to support firm Off-System

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**April 14, 2022**

1                   Sales and to adjust the amount of sales in selected months. The  
2                   listed purchases were not passed through Big Rivers' FAC.

3

4

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
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**April 14, 2022**

1 (a) Purchases: (continued)

<b>Big Rivers Electric Corporation Power Purchases May 1, 2021 through October 31, 2021</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
May – Oct 2021		25 MWs – 7 x 24 110,400 Total	Off-System Sales Adjustments
May – Oct 2021		25 MWs – 7 x 24 110,400 Total	Off-System Sales Adjustments
May – Oct 2021		50 MWs – 7 x 24 220,800 Total	Off-System Sales Adjustments
Jul – Aug 2021		8 MWs – 7 x 24 10,176 Total	Off-System Sales Adjustments
May 2021	MISO	50 MWs – On-Peak 16,000 Total	Purchases for Off-System Sales
May 2021	MISO	50 MWs – On-Peak 16,000 Total	Purchases for Off-System Sales
Jun – Aug 2021	MISO	50 MWs – On-Peak 52,000 Total	Purchases for Off-System Sales
Jun – Oct 2021	MISO	50 MWs – On-Peak 85,600 Total	Purchases for Off-System Sales
June 2021	MISO	100 MWs – Off-Peak 36,800 Total	Purchases for Off-System Sales
Jul – Aug 2021	MISO	50 MWs – On-Peak 34,400 Total	Purchases for Off-System Sales
Jul – Aug 2021	MISO	50 MWs – On-Peak 34,400 Total	Purchases for Off-System Sales
Jul – Sep 2021	MISO	150 MWs – Off-Peak 177,600 Total	Purchases for Off-System Sales

2

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 (a) Purchases: (continued)

<b>Big Rivers Electric Corporation Power Purchases May 1, 2021 through October 31, 2021</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Jul – Oct 2021	MISO	50 MWs – 7 x 24 147,600 Total	Purchases for Off-System Sales
Jul – Oct 2021	MISO	50 MWs – Off-Peak 79,600 Total	Purchases for Off-System Sales
Sep 2021	MISO	100 MWs – On-Peak 33,600 Total	Purchases for Off-System Sales
Sep 2021	MISO	50 MWs – On-Peak 16,800 Total	Purchases for Off-System Sales
Oct 2021	MISO	50 MWs – On-Peak 16,800 Total	Purchases for Off-System Sales
Oct 2021	MISO	50 MWs – On-Peak 16,800 Total	Purchases for Off-System Sales
Oct 2021	MISO	100 MWs – 7 x 24 74,400 Total	Purchases for Off-System Sales

2

3

4

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
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**April 14, 2022**

1 (b) Sales:

2 Big Rivers has contracts with three public power entities in Nebraska to  
3 provide partial requirements service, balancing what they receive from  
4 their incumbent supplier, Western Area Power Administration, and a wind  
5 farm with their load. Any purchases to hedge this transaction shown in  
6 sub-part (a) do not pass through Big Rivers' FAC.

7 Big Rivers has a contract to [REDACTED] to the Kentucky  
8 Municipal Energy Agency ("KYMEA"). KYMEA uses this as a baseload  
9 resource.

10 Big Rivers has a second contract to [REDACTED] to  
11 KYMEA. KYMEA uses this agreement for economic energy, when the  
12 contract price is below the cost of their other resources.

13 On June 1, 2020, Owensboro Municipal Utilities ("OMU") began  
14 taking energy from Big Rivers under a contract in which Big Rivers  
15 supplies full requirements service, net of OMU's SEPA allocation of  
16 capacity and energy. The price is contractually specified.

**BIG RIVERS ELECTRIC CORPORATION**

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**Responses to Commission Staff's First Request for Information  
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**April 14, 2022**

1 (b) Sales: (continued)

<b>Big Rivers Electric Corporation Firm Off-System Sales May 1, 2021 through October 31, 2021</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
May 2021		50 MWs – On–Peak 16,000 Total	Off-System Sales
May 2021		50 MWs – On–Peak 16,000 Total	Off-System Sales
Jun – Aug 2021		50 MWs – On–Peak 52,000 Total	Off-System Sales
Jun – Oct 2021		50 MWs – On–Peak 85,600 Total	Off-System Sales
Jun 2021		100 MWs – Off–Peak 36,800 Total	Off-System Sales
Jun 2021		5 MWs – On–Peak 1,760 Total	Off-System Sales
Jun 2021		45 MWs – On–Peak 15,840 Total	Off-System Sales
Jul – Aug 2021		50 MWs – On–Peak 34,400 Total	Off-System Sales
Jul – Aug 2021		50 MWs – On–Peak 34,400 Total	Off-System Sales
Jul – Sep 2021		150 MWs – Off–Peak 177,600 Total	Off-System Sales
Jul – Oct 2021		50 MWs – 7 x 24 147,600 Total	Off-System Sales
Jul – Oct 2021		50 MWs – Off–Peak 79,600 Total	Off-System Sales

2

**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 First Request for Information  
in the Appendix of the Commission's Order  
dated March 31, 2022**

**April 14, 2022**

1 (b) Sales: (continued)

<b>Big Rivers Electric Corporation Firm Off-System Sales (continued) May 1, 2021 through October 31, 2021</b>			
<b>Date</b>	<b>Electric Utility</b>	<b>MW Commitment</b>	<b>Purpose</b>
Jul 2021		50 MWs – On–Peak 800 Total	Off-System Sales
Sep 2021		100 MWs – On–Peak 33,600 Total	Off-System Sales
Sep 2021		50 MWs – On–Peak 16,800 Total	Off-System Sales
Oct 2021		50 MWs – On–Peak 16,800 Total	Off-System Sales
Oct 2021		50 MWs – On–Peak 16,800 Total	Off-System Sales
Oct 2021		100 MWs – 7 x 24 74,400 Total	Off-System Sales
May – Oct 2021	MISO	25 MWs – 7 x 24 110,400 Total	Off-System Sales
May – Oct 2021	MISO	25 MWs – 7 x 24 110,400 Total	Off-System Sales
May – Oct 2021	MISO	50 MWs – 7 x 24 220,800 Total	Off-System Sales
Jul – Aug 2021	SPP	8 MWs – 7 x 24 10,176 Total	Off-System Sales

2

3 **Witness)** Natalie R. Hankins

4



**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
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FROM MAY 1, 2021 THROUGH OCTOBER 31, 2021  
CASE NO. 2022-00041**

**Responses to Commission Staff's First Request for Information  
in the Appendix of the Commission's Order  
dated March 31, 2022**

**April 14, 2022**

1 **Item 13)** *Provide a monthly billing summary of sales to all electric*  
2 *utilities for the period under review.*

3

4 **Response)** Please see the attached monthly billing summaries for sales to all  
5 electric utilities for the period May 1, 2021, through October 31, 2021.

6

7

8 **Witness)** Jennifer M. Stone

9

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - May 2021**

		KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
1	Member Billing May 2021					
2						
3	JP RURALS	112,103	42,568,406	1,547,581.92	\$ 1,915,578.27	\$ 3,463,160.19
4	KENERGY	200,345	77,015,846	2,765,762.73	3,465,713.07	6,231,475.80
5	MEADE CO. RURALS	75,093	30,584,432	1,036,658.87	1,376,299.44	2,412,958.31
6						
7	<b>TOTAL RURALS</b>	<b>387,541</b>	<b>150,168,684</b>	<b>\$ 5,350,003.52</b>	<b>\$ 6,757,590.78</b>	<b>\$ 12,107,594.30</b>
8						
9		4,997	2,359,750	53,542.86	\$ 89,788.49	\$ 143,331.35
10		40,800	20,019,741	437,172.00	761,751.15	1,198,923.15
11		1,791	580,131	19,190.57	22,073.98	41,264.55
12		15,000	11,160,000	160,725.00	424,638.00	585,363.00
13		102	41,621	1,092.93	1,583.68	2,676.61
14		100	15,972	1,071.50	607.73	1,679.23
15		33,739	21,241,203	361,513.39	808,227.77	1,169,741.16
16		3,304	1,406,851	35,402.36	53,530.68	88,933.04
17		100	24,863	1,071.50	946.04	2,017.54
18		7,265	4,351,625	77,844.48	165,579.33	243,423.81
19		13,290	6,984,803	142,402.35	265,771.75	408,174.10
20		1,983	1,149,575	21,247.85	43,741.33	64,989.18
21		806	153,656	8,636.29	5,846.61	14,482.90
22		150	16,633	1,607.25	632.89	2,240.14
23		180	21,026	1,928.70	800.04	2,728.74
24		2,500	285,907	26,787.50	10,878.76	37,666.26
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>126,107</b>	<b>69,813,357</b>	<b>\$ 1,351,236.53</b>	<b>\$ 2,656,398.23</b>	<b>\$ 4,007,634.76</b>
27						
28	<b>GRAND TOTAL</b>	<b>513,648</b>	<b>219,982,041</b>	<b>\$ 6,701,240.05</b>	<b>\$ 9,413,989.01</b>	<b>\$ 16,115,229.06</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - May 2021**

	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	Member Billing May 2021				
2					
3	\$ 6.00	\$ -	\$ -	\$ (90,032.18)	\$ 318,154.93
4	-	-	-	(162,888.51)	572,458.66
5	-	-	-	(64,686.07)	221,637.25
6					
7	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (317,606.76)</b>	<b>\$ 1,112,250.84</b>
8					
9	\$ -	\$ -	\$ -	\$ (4,990.87)	\$ 13,143.48
10	-	-	(31,370.31)	(42,341.75)	107,032.40
11	-	-	-	(1,226.98)	3,787.96
12	-	-	-	(23,603.40)	53,616.32
13	-	310.74	-	(88.03)	245.54
14	-	-	-	(33.78)	154.46
15	-	-	-	(44,925.14)	107,185.22
16	-	-	-	(2,975.49)	8,157.47
17	-	-	-	(52.59)	185.35
18	-	-	-	(9,203.69)	22,308.08
19	-	-	-	(14,772.86)	37,418.88
20	-	-	-	(2,431.35)	5,956.29
21	-	2,314.44	-	(324.98)	1,331.50
22	-	-	23.80	(35.18)	206.24
23	-	-	380.80	(44.47)	251.19
24	-	-	1,439.75	(604.69)	3,467.49
25					
26	<b>\$ -</b>	<b>\$ 2,625.18</b>	<b>\$ (29,525.96)</b>	<b>\$ (147,655.25)</b>	<b>\$ 364,447.87</b>
27					
28	<b>\$ 6.00</b>	<b>\$ 2,625.18</b>	<b>\$ (29,525.96)</b>	<b>\$ (465,262.01)</b>	<b>\$ 1,476,698.71</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - May 2021**

1	Member Billing May 2021	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 71,429.79	\$ 3,762,718.73	\$ (247,972.77)	\$ 3,514,745.96
4	KENERGY	129,232.59	6,770,278.54	(448,638.64)	6,321,639.90
5	MEADE CO. RURALS	51,320.68	2,621,230.17	(178,162.79)	2,443,067.38
6					
7	<b>TOTAL RURALS</b>	<b>\$ 251,983.06</b>	<b>\$ 13,154,227.44</b>	<b>\$ (874,774.20)</b>	<b>\$ 12,279,453.24</b>
8					
9		\$ 3,959.66	\$ 155,443.62	\$ (8,159.58)	\$ 147,284.04
10		33,593.13	1,265,836.62	(64,175.05)	1,201,661.57
11		973.46	44,798.99	(2,005.99)	42,793.00
12		18,726.48	634,102.40	(38,589.18)	595,513.22
13		69.84	3,214.70	(143.91)	3,070.79
14		26.80	1,826.71	(55.23)	1,771.48
15		35,642.74	1,267,643.98	(73,448.09)	1,194,195.89
16		2,360.70	96,475.72	(4,864.63)	91,611.09
17		41.72	2,192.02	(85.97)	2,106.05
18		7,302.03	263,830.23	(15,047.09)	248,783.14
19		11,720.50	442,540.62	(24,152.13)	418,388.49
20		1,928.99	70,443.11	(3,975.02)	66,468.09
21		257.83	18,061.69	(531.31)	17,530.38
22		27.91	2,462.91	(57.51)	2,405.40
23		35.28	3,351.54	(72.70)	3,278.84
24		479.75	42,448.56	(988.61)	41,459.95
25					
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ 117,146.82</b>	<b>\$ 4,314,673.42</b>	<b>\$ (236,352.00)</b>	<b>\$ 4,078,321.42</b>
27					
28	<b>GRAND TOTAL</b>	<b>\$ 369,129.88</b>	<b>\$ 17,468,900.86</b>	<b>\$ (1,111,126.20)</b>	<b>\$ 16,357,774.66</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - June 2021**

1	Member Billing June 2021	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	129,256	57,435,482	1,784,379.08	\$ 2,584,596.69	\$ 4,368,975.77
4	KENERGY	241,213	101,628,810	3,329,945.47	4,573,296.45	7,903,241.92
5	MEADE CO. RURALS	95,197	38,757,786	1,314,194.59	1,744,100.37	3,058,294.96
6						
7	<b>TOTAL RURALS</b>	<b>465,666</b>	<b>197,822,078</b>	<b>\$ 6,428,519.14</b>	<b>\$ 8,901,993.51</b>	<b>\$ 15,330,512.65</b>
8						
9		5,186	2,366,937	55,567.99	\$ 90,061.95	\$ 145,629.94
10		40,800	17,912,535	437,172.00	681,571.96	1,118,743.96
11		1,925	617,438	20,626.38	23,493.52	44,119.90
12		15,000	10,758,588	160,725.00	409,364.27	570,089.27
13		151	71,570	1,617.97	2,723.24	4,341.21
14		100	16,323	1,071.50	621.09	1,692.59
15		34,214	21,514,813	366,603.01	818,638.63	1,185,241.64
16		3,281	1,413,433	35,155.92	53,781.13	88,937.05
17		100	16,662	1,071.50	633.99	1,705.49
18		7,439	4,598,250	79,708.89	174,963.41	254,672.30
19		13,608	7,615,651	145,809.72	289,775.52	435,585.24
20		1,934	1,114,657	20,722.81	42,412.70	63,135.51
21		762	135,547	8,164.83	5,157.56	13,322.39
22		150	15,299	1,607.25	582.13	2,189.38
23		180	8,838	1,928.70	336.29	2,264.99
24		2,500	198,656	26,787.50	7,558.86	34,346.36
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>127,330</b>	<b>68,375,197</b>	<b>\$ 1,364,340.97</b>	<b>\$ 2,601,676.25</b>	<b>\$ 3,966,017.22</b>
27						
28	<b>GRAND TOTAL</b>	<b>592,996</b>	<b>266,197,275</b>	<b>\$ 7,792,860.11</b>	<b>\$ 11,503,669.76</b>	<b>\$ 19,296,529.87</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - June 2021**

		Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	Member Billing June 2021					
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (175,407.96)	\$ 476,207.40
4	KENERGY	-	-	-	(310,374.39)	861,780.10
5	MEADE CO. RURALS	-	-	-	(118,366.28)	333,567.53
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (604,148.63)</b>	<b>\$ 1,671,555.03</b>
8						
9		\$ -	\$ -	\$ -	\$ (7,228.63)	\$ 15,804.19
10		-	-	(31,370.31)	(54,704.88)	117,968.42
11		-	-	-	(1,885.66)	4,803.24
12		-	-	-	(32,856.73)	61,639.73
13		-	557.18	-	(218.57)	470.97
14		-	-	-	(49.85)	185.39
15		-	-	-	(65,706.24)	128,282.08
16		-	-	-	(4,316.62)	9,656.61
17		-	-	-	(50.89)	186.77
18		-	-	-	(14,043.06)	27,567.67
19		-	-	-	(23,258.20)	47,189.11
20		-	-	-	(3,404.16)	6,838.13
21		-	2,335.87	-	(413.96)	1,458.15
22		-	-	23.80	(46.72)	240.70
23		-	-	-	(26.99)	250.08
24		-	-	628.23	(606.70)	3,782.29
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 2,893.05</b>	<b>\$ (30,718.28)</b>	<b>\$ (208,817.86)</b>	<b>\$ 426,323.53</b>
27						
28	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 2,893.05</b>	<b>\$ (30,718.28)</b>	<b>\$ (812,966.49)</b>	<b>\$ 2,097,878.56</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - June 2021**

1	Member Billing June 2021	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 96,376.74	\$ 4,766,157.95	\$ (253,981.14)	\$ 4,512,176.81
4	KENERGY	170,533.14	8,625,180.77	(449,405.16)	8,175,775.61
5	MEADE CO. RURALS	65,035.56	3,338,531.77	(171,387.90)	3,167,143.87
6					
7	<b>TOTAL RURALS</b>	<b>\$ 331,945.44</b>	<b>\$ 16,729,870.49</b>	<b>\$ (874,774.20)</b>	<b>\$ 15,855,096.29</b>
8					
9		\$ 3,971.72	\$ 158,177.22	\$ (8,351.11)	\$ 149,826.11
10		30,057.23	1,180,694.42	(58,307.95)	1,122,386.47
11		1,036.06	48,073.54	(2,178.47)	45,895.07
12		18,052.91	616,925.18	(37,958.81)	578,966.37
13		120.09	5,270.88	(252.52)	5,018.36
14		27.39	1,855.52	(57.59)	1,797.93
15		36,101.86	1,283,919.34	(75,909.29)	1,208,010.05
16		2,371.74	96,648.78	(4,986.93)	91,661.85
17		27.96	1,869.33	(58.79)	1,810.54
18		7,715.86	275,912.77	(16,223.69)	259,689.08
19		12,779.06	472,295.21	(26,869.80)	445,425.41
20		1,870.39	68,439.87	(3,932.77)	64,507.10
21		227.45	16,929.90	(478.23)	16,451.67
22		25.67	2,432.83	(53.97)	2,378.86
23		14.83	2,502.91	(31.18)	2,471.73
24		333.34	38,483.52	(700.90)	37,782.62
25					
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ 114,733.56</b>	<b>\$ 4,270,431.22</b>	<b>\$ (236,352.00)</b>	<b>\$ 4,034,079.22</b>
27					
28	<b>GRAND TOTAL</b>	<b>\$ 446,679.00</b>	<b>\$ 21,000,301.71</b>	<b>\$ (1,111,126.20)</b>	<b>\$ 19,889,175.51</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - July 2021**

1	Member Billing July 2021	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	138,503	63,490,954	1,912,033.92	\$ 2,857,092.93	\$ 4,769,126.85
4	KENERGY	240,868	112,587,471	3,325,182.74	5,066,436.20	8,391,618.94
5	MEADE CO. RURALS	93,626	43,099,444	1,292,506.93	1,939,474.98	3,231,981.91
6						
7	<b>TOTAL RURALS</b>	<b>472,997</b>	<b>219,177,869</b>	<b>\$ 6,529,723.59</b>	<b>\$ 9,863,004.11</b>	<b>\$ 16,392,727.70</b>
8						
9		5,194	2,418,156	55,653.71	\$ 92,010.84	\$ 147,664.55
10		40,800	20,544,575	437,172.00	781,721.08	1,218,893.08
11		1,851	557,534	19,833.47	21,214.17	41,047.64
12		15,000	11,147,580	160,725.00	424,165.42	584,890.42
13		125	63,187	1,339.38	2,404.27	3,743.65
14		100	19,412	1,071.50	738.63	1,810.13
15		29,030	13,007,000	311,056.45	494,916.35	805,972.80
16		3,304	1,309,073	35,402.36	49,810.23	85,212.59
17		100	8,404	1,071.50	319.77	1,391.27
18		7,908	4,428,375	84,734.22	168,499.67	253,233.89
19		14,126	7,798,532	151,360.09	296,734.14	448,094.23
20		1,999	1,099,593	21,419.29	41,839.51	63,258.80
21		743	134,938	7,961.25	5,134.39	13,095.64
22		150	22,238	1,607.25	846.16	2,453.41
23		180	32,210	1,928.70	1,225.59	3,154.29
24		2,500	202,531	26,787.50	7,706.30	34,493.80
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>123,110</b>	<b>62,793,338</b>	<b>\$ 1,319,123.67</b>	<b>\$ 2,389,286.52</b>	<b>\$ 3,708,410.19</b>
27						
28	<b>GRAND TOTAL</b>	<b>596,107</b>	<b>281,971,207</b>	<b>\$ 7,848,847.26</b>	<b>\$ 12,252,290.63</b>	<b>\$ 20,101,137.89</b>



**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - July 2021**

	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
1	Member Billing July 2021				
2					
3	\$ 6.00	\$ -	\$ -	\$ (26,602.71)	\$ 430,804.24
4	-	-	-	(47,174.15)	758,128.18
5	-	-	-	(18,058.67)	291,959.13
6					
7	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (91,835.53)</b>	<b>\$ 1,480,891.55</b>
8					
9	-	-	-	(1,013.21)	13,389.41
10	-	-	(31,370.31)	(8,608.18)	107,800.82
11	-	-	-	(233.61)	3,709.15
12	-	-	-	(4,670.84)	53,210.19
13	-	353.60	-	(26.48)	339.66
14	-	-	-	(8.13)	162.99
15	-	-	-	(5,449.93)	73,059.75
16	-	-	-	(548.50)	7,716.95
17	-	-	-	(3.52)	124.54
18	-	-	-	(1,855.49)	22,993.33
19	-	-	-	(3,267.58)	40,682.24
20	-	-	-	(460.73)	5,743.08
21	-	2,271.58	-	(56.54)	1,178.55
22	-	-	30.03	(9.32)	220.46
23	-	-	30.03	(13.50)	283.84
24	-	-	753.81	(84.86)	3,087.18
25					
26	<b>\$ -</b>	<b>\$ 2,625.18</b>	<b>\$ (30,556.44)</b>	<b>\$ (26,310.42)</b>	<b>\$ 333,702.14</b>
27					
28	<b>\$ 6.00</b>	<b>\$ 2,625.18</b>	<b>\$ (30,556.44)</b>	<b>\$ (118,145.95)</b>	<b>\$ 1,814,593.69</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - July 2021**

1	Member Billing July 2021	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 106,537.82	\$ 5,279,872.20	\$ (253,402.63)	\$ 5,026,469.57
4	KENERGY	188,921.78	9,291,494.75	(449,354.74)	8,842,140.01
5	MEADE CO. RURALS	72,320.87	3,578,203.24	(172,016.83)	3,406,186.41
6					
7	<b>TOTAL RURALS</b>	<b>\$ 367,780.47</b>	<b>\$ 18,149,570.19</b>	<b>\$ (874,774.20)</b>	<b>\$ 17,274,795.99</b>
8					
9		\$ 4,057.67	\$ 164,098.42	\$ (9,330.81)	\$ 154,767.61
10		34,473.80	1,321,189.21	(73,328.94)	1,247,860.27
11		935.54	45,458.72	(2,151.33)	43,307.39
12		18,705.64	652,135.41	(43,014.58)	609,120.83
13		106.03	4,516.46	(243.82)	4,272.64
14		32.57	1,997.56	(74.91)	1,922.65
15		21,825.75	895,408.37	(50,189.43)	845,218.94
16		2,196.62	94,577.66	(5,051.25)	89,526.41
17		14.10	1,526.39	(32.43)	1,493.96
18		7,430.81	281,802.54	(17,087.53)	264,715.01
19		13,085.94	498,594.83	(30,091.79)	468,503.04
20		1,845.12	70,386.27	(4,242.94)	66,143.33
21		226.43	16,715.66	(520.67)	16,194.99
22		37.32	2,731.90	(85.80)	2,646.10
23		54.05	3,508.71	(124.28)	3,384.43
24		339.85	38,589.78	(781.49)	37,808.29
25					
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ 105,367.24</b>	<b>\$ 4,093,237.89</b>	<b>\$ (236,352.00)</b>	<b>\$ 3,856,885.89</b>
27					
28	<b>GRAND TOTAL</b>	<b>\$ 473,147.71</b>	<b>\$ 22,242,808.08</b>	<b>\$ (1,111,126.20)</b>	<b>\$ 21,131,681.88</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - August 2021**

1	Member Billing August 2021	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	139,884	64,011,826	1,931,098.62	\$ 2,880,532.17	\$ 4,811,630.79
4	KENERGY	251,355	115,979,294	3,469,955.78	5,219,068.23	8,689,024.01
5	MEADE CO. RURALS	95,453	43,879,300	1,317,728.67	1,974,568.50	3,292,297.17
6						
7	<b>TOTAL RURALS</b>	<b>486,692</b>	<b>223,870,420</b>	<b>\$ 6,718,783.07</b>	<b>\$ 10,074,168.90</b>	<b>\$ 16,792,951.97</b>
8						
9		5,179	2,478,563	55,492.99	\$ 94,309.32	\$ 149,802.31
10		40,800	20,644,824	437,172.00	785,535.55	1,222,707.55
11		1,715	583,212	18,376.23	22,191.22	40,567.45
12		15,000	11,132,792	160,725.00	423,602.74	584,327.74
13		143	68,469	1,532.25	2,605.25	4,137.50
14		100	19,998	1,071.50	760.92	1,832.42
15		22,637	14,584,250	242,555.46	554,930.71	797,486.17
16		3,349	1,504,700	35,884.54	57,253.84	93,138.38
17		100	355	1,071.50	13.51	1,085.01
18		7,673	4,498,000	82,216.20	171,148.90	253,365.10
19		15,092	8,347,801	161,710.78	317,633.83	479,344.61
20		2,016	1,176,610	21,601.44	44,770.01	66,371.45
21		778	145,859	8,336.27	5,549.93	13,886.20
22		150	20,724	1,607.25	788.55	2,395.80
23		180	11,738	1,928.70	446.63	2,375.33
24		2,500	179,906	26,787.50	6,845.42	33,632.92
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>117,412</b>	<b>65,397,801</b>	<b>\$ 1,258,069.61</b>	<b>\$ 2,488,386.33</b>	<b>\$ 3,746,455.94</b>
27						
28	<b>GRAND TOTAL</b>	<b>604,104</b>	<b>289,268,221</b>	<b>\$ 7,976,852.68</b>	<b>\$ 12,562,555.23</b>	<b>\$ 20,539,407.91</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - August 2021**

1	Member Billing August 2021	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (37,895.00)	\$ 432,009.97
4	KENERGY	-	-	-	(68,659.74)	780,176.81
5	MEADE CO. RURALS	-	-	-	(25,976.55)	295,605.02
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (132,531.29)</b>	<b>\$ 1,507,791.80</b>
8						
9		\$ -	\$ -	\$ -	\$ (1,467.31)	\$ 13,496.61
10		-	-	(31,370.31)	(12,221.74)	107,424.60
11		-	203.59	-	(345.26)	3,646.51
12		-	-	-	(6,590.61)	52,786.46
13		-	332.17	-	(40.53)	372.77
14		-	-	-	(11.84)	164.10
15		-	-	-	(8,633.88)	71,983.97
16		-	407.17	-	(890.78)	8,387.92
17		-	-	-	(0.21)	96.06
18		-	-	-	(2,662.82)	22,856.62
19		-	-	-	(4,941.90)	43,227.16
20		-	-	-	(696.55)	5,987.35
21		-	2,089.43	-	(86.35)	1,243.03
22		-	-	30.03	(12.27)	214.03
23		-	-	201.21	(6.95)	211.36
24		-	-	801.86	(106.50)	2,994.00
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 3,032.36</b>	<b>\$ (30,337.21)</b>	<b>\$ (38,715.50)</b>	<b>\$ 335,092.55</b>
27						
28	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 3,032.36</b>	<b>\$ (30,337.21)</b>	<b>\$ (171,246.79)</b>	<b>\$ 1,842,884.35</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - August 2021**

1	Member Billing August 2021	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 107,411.84	\$ 5,313,163.60	\$ (250,126.36)	\$ 5,063,037.24
4	KENERGY	194,613.26	9,595,154.34	(453,189.37)	9,141,964.97
5	MEADE CO. RURALS	73,629.47	3,635,555.11	(171,458.47)	3,464,096.64
6					
7	<b>TOTAL RURALS</b>	<b>\$ 375,654.57</b>	<b>\$ 18,543,873.05</b>	<b>\$ (874,774.20)</b>	<b>\$ 17,669,098.85</b>
8					
9		\$ 4,159.03	\$ 165,990.64	\$ (9,169.80)	\$ 156,820.84
10		34,642.01	1,321,182.11	(70,781.95)	1,250,400.16
11		978.63	45,050.92	(2,157.68)	42,893.24
12		18,680.82	649,204.41	(41,187.36)	608,017.05
13		114.89	4,916.80	(253.31)	4,663.49
14		33.56	2,018.24	(73.99)	1,944.25
15		24,472.37	885,308.63	(53,956.53)	831,352.10
16		2,524.89	103,567.58	(5,566.86)	98,000.72
17		0.60	1,181.46	(1.31)	1,180.15
18		7,547.64	281,106.54	(16,640.99)	264,465.55
19		14,007.61	531,637.48	(30,883.89)	500,753.59
20		1,974.35	73,636.60	(4,353.04)	69,283.56
21		244.75	17,377.06	(539.62)	16,837.44
22		34.77	2,662.36	(76.67)	2,585.69
23		19.70	2,800.65	(43.42)	2,757.23
24		301.88	37,624.16	(665.58)	36,958.58
25					
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ 109,737.50</b>	<b>\$ 4,125,265.64</b>	<b>\$ (236,352.00)</b>	<b>\$ 3,888,913.64</b>
27					
28	<b>GRAND TOTAL</b>	<b>\$ 485,392.07</b>	<b>\$ 22,669,138.69</b>	<b>\$ (1,111,126.20)</b>	<b>\$ 21,558,012.49</b>

**Big Rivers Electric Corporation**  
**Monthly Billing Summary**  
**Sales to Members - September 2021**

1	Member Billing September 2021	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	121,381	49,830,338	1,675,664.71	\$ 2,242,365.21	\$ 3,918,029.92
4	KENERGY	218,432	91,499,465	3,015,453.76	4,117,475.93	7,132,929.69
5	MEADE CO. RURALS	79,448	33,677,910	1,096,779.64	1,515,505.95	2,612,285.59
6						
7	<b>TOTAL RURALS</b>	<b>419,261</b>	<b>175,007,713</b>	<b>\$ 5,787,898.11</b>	<b>\$ 7,875,347.09</b>	<b>\$ 13,663,245.20</b>
8						
9		5,201	2,432,531	55,728.72	\$ 92,557.80	\$ 148,286.52
10		40,800	20,119,176	437,172.00	765,534.65	1,202,706.65
11		1,756	420,346	18,815.54	15,994.17	34,809.71
12		15,000	10,788,234	160,725.00	410,492.30	571,217.30
13		157	72,680	1,682.26	2,765.47	4,447.73
14		100	14,379	1,071.50	547.12	1,618.62
15		21,298	13,361,250	228,208.07	508,395.56	736,603.63
16		3,357	1,670,616	35,970.26	63,566.94	99,537.20
17		100	0	1,071.50	-	1,071.50
18		7,772	4,366,000	83,276.98	166,126.30	249,403.28
19		13,997	7,454,315	149,977.86	283,636.69	433,614.55
20		2,236	1,179,312	23,958.74	44,872.82	68,831.56
21		765	146,438	8,196.98	5,571.97	13,768.95
22		150	15,872	1,607.25	603.93	2,211.18
23		180	36,319	1,928.70	1,381.94	3,310.64
24		2,500	178,438	26,787.50	6,789.57	33,577.07
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>115,369</b>	<b>62,255,906</b>	<b>\$ 1,236,178.86</b>	<b>\$ 2,368,837.23</b>	<b>\$ 3,605,016.09</b>
27						
28	<b>GRAND TOTAL</b>	<b>534,630</b>	<b>237,263,619</b>	<b>\$ 7,024,076.97</b>	<b>\$ 10,244,184.32</b>	<b>\$ 17,268,261.29</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - September 2021**

1	Member Billing September 2021	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (45,245.95)	\$ 422,909.74
4	KENERGY	-	-	-	(83,081.51)	770,055.09
5	MEADE CO. RURALS	-	-	-	(30,579.54)	282,044.69
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (158,907.00)</b>	<b>\$ 1,475,009.52</b>
8						
9		\$ -	\$ -	\$ -	\$ (2,208.74)	\$ 16,097.62
10		-	-	(31,370.31)	(18,268.21)	127,309.05
11		-	214.30	-	(381.67)	3,753.59
12		-	-	-	(9,795.72)	62,247.73
13		-	450.03	-	(65.99)	482.79
14		-	-	-	(13.06)	173.67
15		-	-	-	(12,132.02)	80,178.18
16		-	1,242.94	-	(1,516.92)	10,811.85
17		-	-	-	-	113.37
18		-	-	-	(3,964.33)	27,120.68
19		-	-	-	(6,768.52)	47,129.35
20		-	-	-	(1,070.82)	7,480.60
21		-	2,046.57	-	(132.97)	1,481.40
22		-	-	30.23	(14.41)	236.62
23		-	-	30.23	(32.98)	356.38
24		-	-	798.12	(162.02)	3,582.60
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 3,953.84</b>	<b>\$ (30,511.73)</b>	<b>\$ (56,528.38)</b>	<b>\$ 388,555.48</b>
27						
28	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 3,953.84</b>	<b>\$ (30,511.73)</b>	<b>\$ (215,435.38)</b>	<b>\$ 1,863,565.00</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - September 2021**

1	Member Billing September 2021	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 124,227.03	\$ 4,419,926.74	\$ (249,076.42)	\$ 4,170,850.32
4	KENERGY	228,108.17	8,048,011.44	(457,359.11)	7,590,652.33
5	MEADE CO. RURALS	83,959.03	2,947,709.77	(168,338.67)	2,779,371.10
6					
7	<b>TOTAL RURALS</b>	<b>\$ 436,294.23</b>	<b>\$ 15,415,647.95</b>	<b>\$ (874,774.20)</b>	<b>\$ 14,540,873.75</b>
8					
9		\$ 6,064.30	\$ 168,239.70	\$ (9,463.86)	\$ 158,775.84
10		50,157.11	1,330,534.29	(72,417.42)	1,258,116.87
11		1,047.92	39,443.85	(1,635.38)	37,808.47
12		26,895.07	650,564.38	(41,972.05)	608,592.33
13		181.19	5,495.75	(282.76)	5,212.99
14		35.85	1,815.08	(55.94)	1,759.14
15		33,309.60	837,959.39	(51,982.47)	785,976.92
16		4,164.85	114,239.92	(6,499.60)	107,740.32
17		-	1,184.87	-	1,184.87
18		10,884.44	283,444.07	(16,986.09)	266,457.98
19		18,583.61	492,558.99	(29,001.31)	463,557.68
20		2,940.02	78,181.36	(4,588.16)	73,593.20
21		365.07	17,529.02	(569.72)	16,959.30
22		39.57	2,503.19	(61.74)	2,441.45
23		90.54	3,754.81	(141.29)	3,613.52
24		444.85	38,240.62	(694.21)	37,546.41
25					
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ 155,203.99</b>	<b>\$ 4,065,689.29</b>	<b>\$ (236,352.00)</b>	<b>\$ 3,829,337.29</b>
27					
28	<b>GRAND TOTAL</b>	<b>\$ 591,498.22</b>	<b>\$ 19,481,337.24</b>	<b>\$ (1,111,126.20)</b>	<b>\$ 18,370,211.04</b>



**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - October 2021**

1	Member Billing October 2021	KW Billed (a)	kWh (b)	Demand Revenue (c)	Base Energy Revenue (d)	Total Demand & Energy (e) = (c) + (d)
2						
3	JP RURALS	98,582	43,774,191	1,360,924.51	\$ 1,969,838.60	\$ 3,330,763.11
4	KENERGY	181,787	80,816,591	2,509,569.54	3,636,746.60	6,146,316.14
5	MEADE CO. RURALS	62,553	31,081,594	863,544.17	1,398,671.73	2,262,215.90
6						
7	<b>TOTAL RURALS</b>	<b>342,922</b>	<b>155,672,376</b>	<b>\$ 4,734,038.22</b>	<b>\$ 7,005,256.93</b>	<b>\$ 11,739,295.15</b>
8						
9		4,952	1,976,516	53,060.68	\$ 75,206.43	\$ 128,267.11
10		40,800	18,872,661	437,172.00	718,104.75	1,155,276.75
11		1,758	504,968	18,836.97	19,214.03	38,051.00
12		15,000	11,155,835	160,725.00	424,479.52	585,204.52
13		168	98,683	1,800.12	3,754.89	5,555.01
14		100	17,201	1,071.50	654.50	1,726.00
15		20,822	13,359,000	223,107.73	508,309.95	731,417.68
16		3,402	1,453,218	36,452.43	55,294.94	91,747.37
17		100	0	1,071.50	-	1,071.50
18		7,416	4,458,187	79,462.44	169,634.02	249,096.46
19		13,213	6,762,608	141,577.30	257,317.23	398,894.53
20		2,548	1,372,641	27,301.82	52,228.99	79,530.81
21		797	145,750	8,539.86	5,545.79	14,085.65
22		150	13,589	1,607.25	517.06	2,124.31
23		180	21,851	1,928.70	831.43	2,760.13
24		2,500	181,558	26,787.50	6,908.28	33,695.78
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>113,906</b>	<b>60,394,266</b>	<b>\$ 1,220,502.80</b>	<b>\$ 2,298,001.81</b>	<b>\$ 3,518,504.61</b>
27						
28	<b>GRAND TOTAL</b>	<b>456,828</b>	<b>216,066,642</b>	<b>\$ 5,954,541.02</b>	<b>\$ 9,303,258.74</b>	<b>\$ 15,257,799.76</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - October 2021**

1	Member Billing October 2021	Net Green Power (f)	Power Factor Penalty (g)	Billing Adjustment (h)	Fuel Adjustment Clause (FAC) (i)	Environmental Surcharge (ES) (j)
2						
3	JP RURALS	\$ 6.00	\$ -	\$ -	\$ (27,665.29)	\$ 200,345.15
4	KENERGY	-	-	-	(51,076.09)	369,704.74
5	MEADE CO. RURALS	-	-	-	(19,643.57)	136,219.70
6						
7	<b>TOTAL RURALS</b>	<b>\$ 6.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (98,384.95)</b>	<b>\$ 706,269.59</b>
8						
9		\$ -	\$ -	\$ -	\$ (1,249.16)	\$ 7,747.03
10		-		(31,370.31)	(11,927.52)	68,051.08
11		-			(319.14)	2,289.30
12		-			(7,050.49)	35,578.60
13		-	417.89		(62.37)	336.94
14		-			(10.87)	103.22
15		-			(8,442.89)	44,404.08
16		-	825.06		(918.43)	5,545.63
17		-			-	62.91
18		-			(2,817.57)	15,112.56
19		-			(4,273.97)	24,159.58
20		-			(867.51)	4,819.55
21		-	2,443.02		(92.11)	842.95
22		-		30.23	(8.59)	126.21
23		-		241.86	(13.81)	164.45
24		-		773.94	(114.74)	1,998.25
25						
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ -</b>	<b>\$ 3,685.97</b>	<b>\$ (30,324.28)</b>	<b>\$ (38,169.17)</b>	<b>\$ 211,342.34</b>
27						
28	<b>GRAND TOTAL</b>	<b>\$ 6.00</b>	<b>\$ 3,685.97</b>	<b>\$ (30,324.28)</b>	<b>\$ (136,554.12)</b>	<b>\$ 917,611.93</b>

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Sales to Members - October 2021**

1	Member Billing October 2021	Non-FAC PPA (k)	Revenue (l) = $\sum$ (e) to (k)	MRSM - ER Adjustment (m)	Revenue Net of MRSM Adjustments (n) = (l) + (m)
2					
3	JP RURALS	\$ 109,129.06	\$ 3,612,578.03	\$ (245,981.56)	\$ 3,366,596.47
4	KENERGY	201,475.76	6,666,420.55	(454,134.96)	6,212,285.59
5	MEADE CO. RURALS	77,486.41	2,456,278.44	(174,657.68)	2,281,620.76
6					
7	<b>TOTAL RURALS</b>	<b>\$ 388,091.23</b>	<b>\$ 12,735,277.02</b>	<b>\$ (874,774.20)</b>	<b>\$ 11,860,502.82</b>
8					
9		\$ 4,927.45	\$ 139,692.43	\$ (7,930.46)	\$ 131,761.97
10		47,049.54	1,227,079.54	(69,753.14)	1,157,326.40
11		1,258.89	41,280.05	(2,026.11)	39,253.94
12		27,811.50	641,544.13	(44,761.03)	596,783.10
13		246.02	6,493.49	(395.94)	6,097.55
14		42.88	1,861.23	(69.02)	1,792.21
15		33,303.99	800,682.86	(53,600.88)	747,081.98
16		3,622.87	100,822.50	(5,830.81)	94,991.69
17		-	1,134.41	-	1,134.41
18		11,114.26	272,505.71	(17,887.76)	254,617.95
19		16,859.18	435,639.32	(27,133.89)	408,505.43
20		3,421.99	86,904.84	(5,507.51)	81,397.33
21		363.35	17,642.86	(584.79)	17,058.07
22		33.88	2,306.04	(54.52)	2,251.52
23		54.47	3,207.10	(87.67)	3,119.43
24		452.62	36,805.85	(728.47)	36,077.38
25					
26	<b>TOTAL INDUSTRIALS</b>	<b>\$ 150,562.89</b>	<b>\$ 3,815,602.36</b>	<b>\$ (236,352.00)</b>	<b>\$ 3,579,250.36</b>
27					
28	<b>GRAND TOTAL</b>	<b>\$ 538,654.12</b>	<b>\$ 16,550,879.38</b>	<b>\$ (1,111,126.20)</b>	<b>\$ 15,439,753.18</b>

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 May 2021**

1	May 2021 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	9,709	\$ 287,761.04
5	[REDACTED]	9,000	\$ 272,455.13
6	MISO	256,025	\$ 7,045,153.89
7	[REDACTED]		\$ 178,215.98
8	[REDACTED]	61,631	\$ 2,318,300.81
9	[REDACTED]		\$ 33,577.07
10	[REDACTED]		\$ 38,492.62
11	[REDACTED]	46,800	\$ 2,543,574.00
12	[REDACTED]		\$ (212.50)
13	<hr/>		
14	TOTAL SPECIAL SALES - ENERGY	383,165	\$ 12,717,318.04
15	<hr/>		
16	SPECIAL SALES - BILATERAL		
17	[REDACTED]		\$ 524,000.00
18	[REDACTED]		\$ -
19	[REDACTED]		\$ (1,531,710.00)
20	MISO - CONTRA REVENUE		\$ 1,030,147.67
21	[REDACTED]		\$ 7,850.00
22	<hr/>		
23	TOTAL SPECIAL SALES - BILATERAL		\$ 30,287.67

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Other Sales  
May 2021**

1	May 2021 - Other Sales	MWH	REVENUE
2	SPECIAL SALES - CAPACITY		
3	MISO - CAPACITY SALES		\$ (934.96)
4			\$ 315,000.00
5			
6	TOTAL SPECIAL SALES - BILATERAL		\$ 314,065.04
7			
8	TOTAL	383,165	\$ 13,061,670.75
9			

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Other Sales  
June 2021**

1	June 2021 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	14,106	\$ 560,590.70
5	[REDACTED]		
6	MISO	190,598	\$ 6,232,921.37
7	[REDACTED]		\$ 652,152.91
8	[REDACTED]	79,369	\$ 3,039,301.29
9	[REDACTED]		\$ 62,036.16
10	[REDACTED]		\$ 46,711.92
11	[REDACTED]	49,300	\$ 2,603,328.00
12	[REDACTED]		\$ (119,892.50)
13	<hr/>		
14	TOTAL SPECIAL SALES - ENERGY	333,373	\$ 13,077,149.85
15			
16	SPECIAL SALES - BILATERAL		
17	[REDACTED]		\$ 598,400.00
18	[REDACTED]		\$ 630,080.00
19	[REDACTED]		
20	[REDACTED]		\$ (1,482,300.00)
21	MISO - CONTRA REVENUE		\$ (15,477.21)
22	[REDACTED]		\$ 335,860.00
23	<hr/>		
24	TOTAL SPECIAL SALES - BILATERAL		\$ 66,562.79

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 June 2021**

1	June 2021 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	MISO - CAPACITY SALES		\$ (13,310.70)
5	[REDACTED]		\$ 364,500.00
6	[REDACTED]		\$ 49,635.00
7			
8	TOTAL SPECIAL SALES - BILATERAL		\$ 400,824.30
9			
10	TOTAL	333,373	\$ 13,544,536.94

**Big Rivers Electric Corporation  
Monthly Billing Summary  
Other Sales  
July 2021**

1	July 2021 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	5,029	\$ 207,605.44
5	[REDACTED]	433	\$ 29,739.19
6	MISO	194,988	\$ 6,804,284.40
7	[REDACTED]		\$ 188,020.62
8	[REDACTED]	84,830.000	\$ 3,282,496.63
9	[REDACTED]		\$ 33,002.91
10	[REDACTED]		\$ 31,827.99
11	[REDACTED]	62,750.000	\$ 2,927,888.00
12	[REDACTED]		\$ 9,532.00
13	<hr/>		
14	TOTAL SPECIAL SALES - ENERGY	348,029	\$ 13,514,397.18
15	<hr/>		
16	SPECIAL SALES - BILATERAL		
17	[REDACTED]		\$ 571,200.00
18	[REDACTED]		\$ 601,440.00
19	[REDACTED]		\$ (937,830.00)
20	MISO - CONTRA REVENUE		\$ (4,239,065.41)
21	[REDACTED]		\$ 107,130.00
22	[REDACTED]		\$ 3,413,460.00
23	<hr/>		
24	TOTAL SPECIAL SALES - BILATERAL		\$ (483,665.41)



**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 July 2021**

1	July 2021 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	[REDACTED]		
5	MISO - CAPACITY SALES		\$ (13,754.39)
6	[REDACTED]		\$ 364,500.00
7	[REDACTED]		\$ 49,635.00
8			
9	TOTAL SPECIAL SALES - BILATERAL		\$ 400,380.61
10			
11	TOTAL	348,029	\$ 13,431,112.38

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 August 2021**

1	August 2021 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	18,154	\$ 764,809.68
5	MISO	161,446	\$ 6,518,588.44
6	[REDACTED]		\$ 45,471.73
7	[REDACTED]	87,956	\$ 3,361,437.46
8	[REDACTED]		\$ 18,263.45
9	[REDACTED]		\$ 31,197.06
10	[REDACTED]	69,450.000	\$ 3,102,238.00
11	[REDACTED]		
12	<hr/>		
13	TOTAL SPECIAL SALES - ENERGY	337,006	\$ 13,842,005.82
14	<hr/>		
15	SPECIAL SALES - BILATERAL		
16	[REDACTED]		\$ 598,400.00
17	[REDACTED]		\$ 630,080.00
18	[REDACTED]		\$ (909,550.00)
19	MISO - CONTRA REVENUE		\$ (4,866,627.55)
20	[REDACTED]		\$ 136,810.00
21	[REDACTED]		\$ 3,330,220.00
22	<hr/>		
23	TOTAL SPECIAL SALES - BILATERAL		\$ (1,080,667.55)

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 August 2021**

1	August 2021 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	[REDACTED]		
5	MISO - CAPACITY SALES		\$ (13,754.39)
6	[REDACTED]		\$ 364,500.00
7	[REDACTED]		\$ 49,635.00
8			
9	TOTAL SPECIAL SALES - BILATERAL		\$ 400,380.61
10			
11	TOTAL	337,006	\$ 13,161,718.88

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 September 2021**

1	September 2021 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	10,141	\$ 459,044.31
5	[REDACTED]	1,800	\$ 97,934.63
6	MISO	183,991	\$ 8,520,787.64
7	[REDACTED]		\$ 169,747.73
8	[REDACTED]	70,202.000	\$ 2,677,788.28
9	[REDACTED]		\$ 47,319.49
10	[REDACTED]		\$ 44,335.43
11	[REDACTED]	71,400.000	\$ 3,149,325.00
12	<hr/>		
13	TOTAL SPECIAL SALES - ENERGY	337,534	\$ 15,166,282.51
14	<hr/>		
15	SPECIAL SALES - BILATERAL		
16	[REDACTED]		\$ 571,200.00
17	[REDACTED]		\$ (1,482,300.00)
18	MISO - CONTRA REVENUE		\$ (4,905,358.98)
19	[REDACTED]		\$ 1,503,900.00
20	[REDACTED]		\$ 3,246,960.00
21	<hr/>		
22	TOTAL SPECIAL SALES - BILATERAL		\$ (1,065,598.98)

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 September 2021**

1	September 2021 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	MISO - CAPACITY SALES		\$ (13,310.70)
5	[REDACTED]		\$ 364,500.00
6	[REDACTED]		\$ 49,635.00
7			
8	TOTAL SPECIAL SALES - BILATERAL		\$ 400,824.30
9			
10	TOTAL	337,534	\$ 14,501,507.83

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 October 2021**

1	October 2021 - Other Sales	MWH	REVENUE
2	<hr/>		
3	SPECIAL SALES - ENERGY		
4	[REDACTED]	7,360	\$ 487,423.55
5	[REDACTED]	6,730	\$ 497,186.26
5	MISO	200,880	\$ 11,955,315.22
6	[REDACTED]		\$ (332,529.77)
7	[REDACTED]	62,480.000	\$ 2,361,073.72
8	[REDACTED]		\$ (59,265.75)
9	[REDACTED]		\$ (14,046.71)
10	[REDACTED]	74,400.000	\$ 3,221,775.50
11	[REDACTED]		
12	<hr/>		
13	TOTAL SPECIAL SALES - ENERGY	351,849	\$ 18,116,932.02
14	<hr/>		
15	SPECIAL SALES - BILATERAL		
16	[REDACTED]		\$ 1,105,440.00
17	[REDACTED]		\$ (1,531,710.00)
18	MISO - CONTRA REVENUE		\$ (6,664,424.57)
18	[REDACTED]		\$ 1,764,210.00
19	[REDACTED]		\$ 2,423,640.00
20	<hr/>		
21	TOTAL SPECIAL SALES - BILATERAL		\$ (2,902,844.57)

**Big Rivers Electric Corporation  
 Monthly Billing Summary  
 Other Sales  
 October 2021**

1	October 2021 - Other Sales	MWH	REVENUE
2			
3	SPECIAL SALES - CAPACITY		
4	MISO - CAPACITY SALES		\$ (13,754.39)
5	[REDACTED]		\$ 364,500.00
6	[REDACTED]		\$ 49,635.00
7			
8	TOTAL SPECIAL SALES - BILATERAL		\$ 400,380.61
9			
10	TOTAL	351,849	\$ 15,614,468.06

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
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**Responses to Commission Staff's First Request for Information  
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**April 14, 2022**

1 **Item 14)** *Describe the effect on the FAC calculation of line losses related*

2 *to:*

3 *a. Intersystem sales when using a third-party transmission system;*

4 *and*

5 *b. Intersystem sales when not using a third-party transmission system.*

6

7 **Response)**

8 a. Big Rivers had no intersystem sales during the period under review which  
9 used a third-party transmission system.

10 b. Line losses related to intersystem sales, which did not use a third-party  
11 transmission system, are included in Big Rivers' total System Losses  
12 reported on page 3 of its monthly Form A filing. Big Rivers calculates an  
13 overall system average fuel cost per kWh each month by dividing (1) the  
14 total cost of fuel for generation by (2) the net kWh generated less total  
15 System Losses. The overall system average fuel cost per kWh (which  
16 accounts for total System Losses, including losses related to intersystem

**Case No. 2022-00041**

**Response to PSC 1-14**

**Witnesses: Natalie R. Hankins (a. only) and**

**Jennifer M. Stone (b. only)**

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**BIG RIVERS ELECTRIC CORPORATION**

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1 sales) is multiplied by the total intersystem sales volume to calculate the  
2 cost of fuel allocated to intersystem sales in Big Rivers' FAC calculation.

3

4

5 **Witnesses)** Natalie R. Hankins (*a. only*) and

6 Jennifer M. Stone (*b. only*)

7

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 **Item 15)** *Provide a list, in chronological order, showing by unit any*  
2 *scheduled, actual, and forced outages for the period under review.*

3

4 **Response)** Please see the attached summary for the requested information  
5 regarding scheduled ("S"), actual ("A"), and forced ("F") outages.

6

7

8 **Witness)** Ronald D. Gregory

9

## Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1 2021, through October 31 2021

Big Rivers Electric Corporation  
Reid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net  
May 1 2021, through October 31 2021

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May 2021		No Outages							
June 2021	F			6/18/2021 15:16	6/18/2021 16:41	1:25	1:25		Unit tripped offline due to high exhaust temperature caused by a failed sensor.
	F			6/28/2021 11:03	6/28/2021 13:29	2:26	2:26		Unit tripped offline due to vibration indication.
	F			6/28/2021 13:34	6/28/2021 15:50	2:16	2:16		Unit tripped due to bad sensor causing vibration alarm trip
July 2021	S, A	7/16/2021 07:00	7/16/2021 11:00	7/16/2021 7:00	7/16/2021 11:00	4:00		4:00	Maintenance Outage for work on Auxiliary Transformer feed
August 2021	F			8/30/2021 13:47	8/30/2021 13:52	0:05		0:05	Starting Failure Outage due to 15 minute starting limit reached
	F			8/30/2021 14:00	9/1/2021 0:00	34:00		34:00	Forced Outage to make repairs to gas control valve hydraulic system.
September 2021	F			9/1/2021 0:00	9/2/2021 10:31	34:31		34:31	Forced Outage to make repairs to gas control valve hydraulic system.
October 2021	S, A	10/7/2021 11:00	10/7/2021 15:00	10/7/2021 11:07	10/7/2021 14:58	4:00		3:51	Maintenance Outage to replace a failed #3 vibration probe.
	S,A	10/25/2021 08:00	10/28/2021 20:00	10/25/2021 8:00	10/28/2021 12:49	84:00		76:49	Maintenance Outage to install new voltage control components.
	S,A	10/28/2021 12:49	10/28/2021 13:49	10/28/2021 13:09	10/28/2021 13:42	1:00		0:33	Maintenance Outage to test voltage controls.

## Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1 2021, through October 31 2021

Big Rivers Electric Corporation  
Green Station Unit #1 - Coal/Pet coke - 231MW Net  
May 1 2021, through October 31 2021

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May 2021		No Outages							
June 2021	F			6/6/2021 12:09	6/8/2021 9:08	44:59	44:59		Forced Outage due to a reheater outlet tube leak - 30th panel from east wall 6th tube back 2 dutchman installed.
	F			6/8/2021 11:11	6/8/2021 12:20	1:09	1:09		Turbine tripped while transferring valves during start-up.
July 2021	F			7/4/2021 2:45	7/6/2021 3:26	48:41	48:41		Waterwall tube leak on north knees of boiler - 13th tube from east wall - 2 dutchman installed.
August 2021	S, A	8/28/2021 07:00	8/29/2021 7:00	8/28/2021 7:00	8/29/2021 8:45	24:00	25:45		Maintenance Outage to clean condenser tubes and check FGD mist eliminator panels.
September 2021	F			9/11/2021 6:59	9/12/2021 5:35	22:36	22:36		Forced Outage due to waterwall tube leak.
	S, A	9/12/2021 5:35	9/13/2021 5:35	9/12/2021 5:35	9/13/2021 6:00	24:00	24:25		Maintenance Outage to repair a small waterwall tube leak found during hydro after previous outage.
October 2021	S, A	10/21/2021 12:00	10/22/2021 12:00	10/21/2021 12:15	10/22/2021 10:15	24:00	22:00		Maintenance Outage to repair a waterwall tube leak discovered during hydro.

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2021, through October 31 2021**

Big Rivers Electric Corporation  
**Green Station Unit #2 - Coal/Pet coke - 223MW Net**  
 May 1 2021, through October 31 2021

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May 2021	F			5/29/2021 19:34	5/30/2021 5:05		9:31	9:31	The right hand turbine governor valve developed a problem, where it was not following the signal to maintain load properly In order to troubleshoot and repair the valve the unit had to be taken off-line.
June 2021	F			6/6/2021 01:38	6/7/2021 19:14		41:36	41:36	Operations tripped the unit after recognizing the right hand turbine intercept valve was drifting into the close position.
July 2021	F			7/1/2021 22:06	7/3/2021 5:00		30:54	30:54	Waterwall leak on north knees of boiler - 131st tube from east wall - 3 dutchman installed.
	S, A	7/3/2021 05:00	7/4/2021 14:00	7/3/2021 05:00	7/4/2021 13:44	33:00		32:44	Maintenance Outage to rebuild the right hand intercept dump valve.
	F			7/26/2021 02:56	7/27/2021 21:05		42:09	42:09	Waterwall tube leak on the east wall at elevation 490' and 12' from south inspection port - 1 dutchman installed.
August 2021	S, A	8/13/2021 21:00	8/15/2021 21:00	8/13/2021 21:32	8/15/2021 18:30	48:00		44:58	Unit removed from service to replace pump motors on step-up transformer.
September 2021		No Outages							
October 2021	F			10/21/2021 21:00	10/22/2021 2:30		5:30	5:30	Unit removed from service due to fuel supply issues in coal handling.

## Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1 2021, through October 31 2021

Big Rivers Electric Corporation  
Wilson Station - Unit #1 - Coal/Pet Coke - 417MW Net  
May 1 2021, through October 31 2021

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May 2021	F			5/14/2021 11:45	5/16/2021 3:09	39:24	39:24		Waterwall tube leak on nose arch slope, just off the West wall.
	S,A	5/16/2021 03:00	5/18/2021 3:00	5/16/2021 3:09	5/18/2021 6:56	48:00	51:47		Maintenance Outage to repair a known tube leak that had been identified prior to the unit being forced off.
June 2021	F			6/6/2021 15:54	6/6/2021 20:12	4:18	4:18		Unit tripped due to back pressure when the #3 Circulating Water Pump (CWP) tripped off and #2 CWP tripped while attempting to restart #3 CWP.
	F			6/9/2021 5:37	6/11/2021 10:08	52:31	52:31		Tube leak in the Economizer Inlet Header.
	F			6/21/2021 1:09	6/21/2021 4:51	3:42	3:42		Unit tripped due to low drum level caused by a cascade of events during a boiler upset that was started by loss of fuel feed when the #1 Mill feeder tripped.
July 2021	F			7/4/2021 3:22	7/4/2021 5:27	2:05	2:05		Unit tripped while testing right hand Stop Valve.
	F			7/12/2021 19:20	7/15/2021 1:10	53:50	53:50		Unit tripped due to the Secondary Airheater drive locking up.
	F			7/26/2021 17:13	7/27/2021 22:46	29:33	29:33		Waterwall tube leak under the nose on the north wall, about 18' from the west wall.
August 2021		No Outages							

**Big Rivers Electric Corporation**  
**Scheduled ("S"), Actual ("A"), and Forced ("F") Outages**  
**May 1 2021, through October 31 2021**

Big Rivers Electric Corporation  
**Wilson Station - Unit #1 - Coal/Pet Coke - 417MW Net**  
 May 1 2021, through October 31 2021

Schedule vs. Actual

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
September 2021	S, A	9/6/2021 14:00	9/11/2021 6:00	9/6/2021 13:40	9/11/2021 5:05	112:00		111:25	Maintenance Outage to repair a Platen Superheat tube leak.
	F			9/11/2021 9:15	9/12/2021 0:23		15:08	15:08	Unit was taken offline to repair Main Steam Isolation Valve (HMV-170) packing leak.
October 2021	F			10/27/2021 14:51	10/28/2021 4:51		14:00	14:00	Forced Outage due to a manual switchyard disconnect failure.
	S,A	10/28/2021 06:00	10/31/2021 6:00	10/28/2021 4:51	10/31/2021 0:23	72:00		67:32	Maintenance Outage to repair a small leak in finishing Superheat Section.

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 **Item 16)** *For the period under review, provide the monthly capacity factor*  
2 *at which each generating unit operated.*

3

4 **Response)** Please see the table and the footnotes which follow.

5

<b>Big Rivers Electric Corporation Monthly Capacity Factor by Generating Unit</b>							
<b>Generating Unit</b>	<b>Metric a.</b>	<b>May 2021</b>	<b>June 2021</b>	<b>July 2021</b>	<b>Aug. 2021</b>	<b>Sept. 2021</b>	<b>Oct. 2021</b>
Reid Station Unit # 2 CT	GCF	0.2%	3.3%	0.9%	1.3%	0.1%	0.7%
	NCF	-0.1%	3.1%	0.7%	1.1%	-0.9%	0.5%
Green Station Unit # 1	GCF	83.2%	80.6%	89.9%	90.7%	89.3%	72.0%
	NCF	81.1%	78.5%	88.3%	89.1%	87.8%	70.5%
Green Station Unit # 2	GCF	81.5%	79.8%	76.1%	63.6%	71.9%	64.4%
	NCF	79.7%	77.9%	74.5%	62.0%	70.4%	63.2%
Wilson Station Unit # 1	GCF	81.5%	86.1%	83.1%	94.7%	76.1%	84.4%
	NCF	81.4%	85.9%	82.7%	94.5%	75.6%	84.1%

6

**Footnotes to Big Rivers Monthly Capacity Factor table on prior page:**

$$\text{a.- NCF (Net Capacity Factor)} = \frac{\text{Net Actual Generation} \times 100\%}{\text{PH (Period Hours)} \times \text{NMC (Net Maximum Capacity)}}$$

$$\text{GCF (Gross Capacity Factor)} = \frac{\text{Gross Actual Generation} \times 100\%}{\text{PH (Period Hours)} \times \text{GMC (Gross Maximum Capacity)}}$$

7

8 **Witness)** Jason C. Burden



**BIG RIVERS ELECTRIC CORPORATION**

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1 Item 17) *For the period under review, explain whether BREC made any*  
2 *changes to its maintenance and operation practices or completed any*  
3 *specific generation efficiency improvements that affect fuel usage at BREC's*  
4 *generation facilities. If so, describe the impact of these changes on BREC's*  
5 *fuel usage.*

6

7 **Response)** In the period under review, May 1, 2021, through October 31, 2021, Big  
8 Rivers has not made any changes to its maintenance and operation practices, or  
9 completed any specific generation efficiency improvements that affect fuel usage at  
10 Big Rivers' generation facilities.

11

12

13 **Witness)** Jason C. Burden

14

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 **Item 18)** *State whether BREC is aware of any violations of its policies and*  
2 *procedures regarding fuel procurement that occurred prior to or during the*  
3 *period under review.*

4

5 **Response)** Big Rivers is unaware of any violations of its policies and procedures  
6 regarding fuel procurement that occurred during the period May 1, 2021, through  
7 October 31, 2021. Big Rivers is also unaware of any unreported violation prior to the  
8 current period under review.

9

10

11 **Witness)** Vicky L. Payne

12

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 **Item 19)** *State whether BREC is aware of any violations of 807 KAR 5:056*  
2 *that occurred prior to or during the period under review.*

3

4 **Response)** Big Rivers is unaware of any violations of 807 KAR 5:056 that occurred  
5 prior to or during the period under review.

6

7

8 **Witness)** Jennifer M. Stone

9

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
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**April 14, 2022**

1 **Item 20)** *State whether all fuel contracts related to commodity and*  
2 *transportation have been filed with the Commission. If any contracts have*  
3 *not been filed, explain why they have not been filed, and provide a copy.*

4

5 **Response)** All of Big Rivers' fuel and transportation contracts have been filed with  
6 the Commission.

7

8

9 **Witness)** Vicky L. Payne

10

**BIG RIVERS ELECTRIC CORPORATION**

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**April 14, 2022**

1 **Item 21) Refer to KRS 278.277(1) which states that:**

2 *In any review by the commission of any fuel adjustment clause, for any*  
3 *contracts entered into on or after July 1, 2021, the commission shall, in*  
4 *determining the reasonableness of fuel costs in procurement contracts*  
5 *and fuel procurement practices, evaluate the reasonableness of fuel*  
6 *costs in contracts and competing bids based on the cost of the fuel less*  
7 *any coal severance tax imposed by any jurisdiction.*

8 *a. Provide a listing of any new coal contracts entered into on or since July 1,*  
9 *2021.*

10 *b. For each bid solicitation or potential spot purchase that resulted in a new*  
11 *purchase contract on or after July 1, 2021, provide the bid evaluation*  
12 *sheets that include:*

13 *(1) The coal severance tax rate being levied, if any;*

14 *(2) The coal severance tax rate per ton or MMBTU, as appropriate, being*  
15 *levied;*

16 *(3) The cost per ton or MMBTU, as appropriate, including any severance*  
17 *tax; and*

18 *(4) The cost per ton or MMBTU, as appropriate, excluding any severance*  
19 *tax.*

20

**BIG RIVERS ELECTRIC CORPORATION**

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL  
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1 **Response)**

2 a. Please see the table blow

<b>Big Rivers Electric Corporation New Coal Contracts entered into on or since July 1, 2021</b>				
<b>Supplier</b>	<b>Contract</b>	<b>Effective Date</b>	<b>Type</b>	<b>Solicitation</b>
Alliance Coal, LLC	BRE-22-002	1/1/2022	Long Term	Bid
American Consolidated Natural Resources, Inc.	BRE-22-001	1/1/2022	Long Term	Bid
Alliance Coal, LLC	BRE-21-009	11/3/2021	Spot	Email
Coal Network, LLC	BRE-21-007	11/2/2021	Spot	Email
Coal Network, LLC	BRE-21-006	11/2/2021	Spot	Email
Alliance Coal, LLC	BRE-21-005	8/9/2021	Spot	Bid

3

4 b.

5 (1) and (2)

6 Kentucky Severance Tax = (Sales Price *minus* Transportation) x 4.5%.

7

**BIG RIVERS ELECTRIC CORPORATION**

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1 (3) and (4)

2 Please see the table below.

<b>Big Rivers Electric Corporation New Coal Contracts entered into on or since July 1, 2021 Severance Tax</b>				
	<b>ACNR <sup>5</sup></b>	<b>Alliance Coal</b>	<b>ACNR <sup>8</sup></b>	<b>Alliance Coal</b>
	<b><i>\$/ Ton including Severance Tax</i></b>		<b><i>\$/ Ton excluding Severance Tax</i></b>	
2021	Not Applicable	\$ 52.50	Not Applicable	\$ 50.14
2022	\$ 42.14	\$ 42.00	\$ 40.24	\$ 40.11
2023	\$ 42.54	\$ 44.00	\$ 40.63	\$ 42.02
2024	\$ 42.93	\$ 46.00	\$ 41.00	\$ 43.93

3

4

5 **Witness)** Vicky L. Payne

6

---

<sup>5</sup> ACNR = American Consolidated Natural resources, Inc.