$\begin{array}{c} 1 \\ 2 \end{array}$	COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY	
3	BEI ONE THE I OBEIC SERVICE COMMISSION OF MENTOCKI	
4 5	In the Matter of:	
6	ELECTRONIC APPLICATION OF BIG RIVERS  ELECTRIC CORPORATION FOR APPROVAL  OF AMENDMENT TO POWER PURCHASE  AGREEMENT  OCCUPANTION OF BIG RIVERS  Case No.  2022-00296	
7		
8 9	MOTION OF BIG RIVERS ELECTRIC CORPORATION	
10	FOR AN ORDER ESTABLISHING A PROCEDURAL SCHEDULE	
11 12	1. Comes Big Rivers Electric Corporation ("Big Rivers"), by counsel,	
13	and hereby moves the Public Service Commission (the "Commission") for an	
14	Order establishing a procedural schedule in this case. A proposed procedural	
15	schedule is attached hereto as Exhibit A. In support of this motion, Big Rivers	
16	states as follows:	
17	2. On September 22, 2022, Big Rivers filed an application, pursuant to	
18	KRS 278.020(1), KRS 278.300, and 807 KAR 5:001, seeking Commission approval	
19	of an amendment ("Amendment No. 1") to the Power Purchase Agreement	
20	between Big Rivers and Unbridled Solar, LLC ("Unbridled Solar"), formerly	
21	known as Henderson Solar, LLC, entered on May 26, 2020 (the "Unbridled PPA"	
22	or " <i>PPA</i> ").	
23	3. As explained in Big Rivers' application in this case, the solar project	
24	that is the subject of the PPA is significantly behind schedule because of delays in	
25	the interconnection process, among other holdups. Since the PPA provides	
26	significant value to Big Rivers and its Members, Big Rivers desires for the project	

Commission enter a procedural schedule. 3 4. The Attorney General of the Commonwealth of Kentucky (the "Attorney General"), moved the Commission to grant him intervention, and on October 14, 2022, the Commission granted the Attorney General's Motion to Intervene. No other parties have moved to intervene in this proceeding. 7 5. Big Rivers has conferred with counsel for the Attorney General, and reports that the Attorney General does not object to the proposed procedural schedule set forth in Exhibit A to this Motion. 9 10 WHEREFORE, on the basis of the foregoing, Big Rivers requests that the Commission enter an Order setting a procedural schedule in this proceeding. 11 12 On this the 19th day of December, 2022. Respectfully submitted, 13 14 15 /s/ Tyson Kamuf 16 Tyson Kamuf 17 18 Senthia Santana 19 Whitney Kegley Big Rivers Electric Corporation 20 21 201 Third Street 22 P.O. Box 24 23 Henderson, Kentucky 42419-0024 24Phone: (270) 827-2561 25 Facsimile: (270) 844-6417 tyson.kamuf@bigrivers.com 26senthia.santana@bigrivers.com 27 28 whitney.kegley@bigrivers.com 29 Counsel for Big Rivers Electric 30 Corporation

1 to be completed as soon as possible. Therefore, Big Rivers requests that the

## **EXHIBIT A**

Last day for intervention requests to be accepted	12/30/22
All initial requests for information to BREC shall be filed no later than	01/13/23
BREC shall file responses to initial requests for information no later than	01/27/23
All supplemental requests for information to BREC shall be filed no later than	02/10/23
BREC shall file responses to supplemental requests for information no later than	02/24/23
Last day for Parties to request a Public Hearing or submit a Request for the matter be decided upon the written record	02/28/23