



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

**AN ELECTRONIC EXAMINATION OF THE
APPLICATION OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION FROM
NOVEMBER 1, 2020 THROUGH OCTOBER 31, 2022**

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**Case No.
2023-00013**

**Supplemental Response to Item 4 of Commission Staff's
Third Request for Information**

dated November 1, 2023

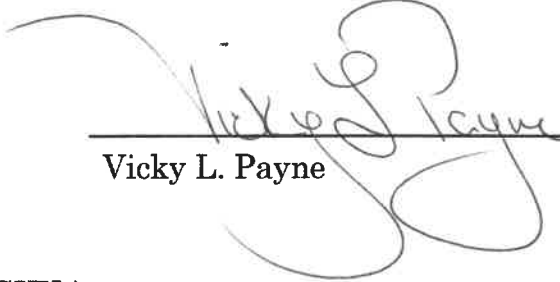
FILED: January 25, 2024

BIG RIVERS ELECTRIC CORPORATION

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL
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FROM NOVEMBER 1, 2020 THROUGH OCTOBER 31, 2022
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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 DAVIESS)

24 SUBSCRIBED AND SWORN TO before me by Vicky L. Payne on this the
day of January, 2024.



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

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1 **Item 4)** *Refer to BREC's response to Staffs Second Request, Item 15. The*
2 *response seems to indicate that when electricity demand is high and when*
3 *BREC's Green and Reid units may be profitable, it may not be able to*
4 *transport spot gas to its city gate. Consequently, it may be paying more for*
5 *energy than it would otherwise. Explain whether BREC has performed a*
6 *study to determine whether it would be worthwhile to obtain firm*
7 *transmission pipeline transportation.*

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9 **Supplemental Response)** Big Rivers evaluated firm gas transportation supply as
10 an alternative scenario included in its analysis that Big Rivers filed in Case No. 2021-
11 00079 in support of its application for a CPCN to convert Green Station to gas. Please
12 see the Direct Testimony of Michael T. Pullen in that case (“Pullen Direct
13 Testimony”), at p. 17, lines 1-8. Results of the analysis are provided in Exhibits
14 Pullen-2 and Pullen-3 to the Pullen Direct Testimony. Please see also Pullen Direct
15 Testimony at p.11, line 3 – p. 12, line 3; id. at p. 14, lines 14-20; Direct Testimony of
16 Mark Eacret in Case No. 2021-00079, at p. 11, lines 11-17.

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2 **Witness)** Vicky L. Payne

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