

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC 2023 INTEGRATED)
RESOURCE PLAN OF BIG RIVERS) CASE NO. 2023-00310
ELECTRIC CORPORATION)

**POST-HEARING DATA REQUESTS OF JOINT INTERVENORS
KENTUCKIANS FOR THE COMMONWEALTH AND KENTUCKY RESOURCES
COUNCIL**

Shannon Fisk
Earthjustice
48 Wall Street, 15th Floor
New York, NY 10005
(215) 717-4522
sfisk@earthjustice.org

Thomas Cmar
Earthjustice
6608 Wooster Pike
Cincinnati, OH 45227
(312) 257-9338
tcmr@earthjustice.org

Mychal Ozaeta
Earthjustice
707 Wilshire Blvd., Suite 4300
Los Angeles, CA 90017
(213) 766-1069
mozaeta@earthjustice.org

Byron L. Gary
Ashley Wilmes
Thomas J. FitzGerald
Kentucky Resources Council
P.O. Box 1070
Frankfort, KY 40602
(502) 875-2428
Byron@kyrc.org
Ashley@kyrc.org
FitzKRC@aol.com

*Counsel for Joint Intervenors
Kentuckians for the Commonwealth
and Kentucky Resources Council*

Dated: May 31, 2024

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. Unless otherwise specified in each individual interrogatory or request, the terms “you,” “your,” “Big Rivers,” or “Company” refer collectively to Big Rivers Electric Corporation, including any parent or affiliated companies, predecessors-in-interest, officers, directors, employees, authorized agents, outside consultants or contractors, or other representatives who may have knowledge of the particular matter addressed.
11. “Joint Intervenors” or “JI” means the Kentuckians For the Commonwealth and Kentucky Resources Council.

12. “LRTP” means Long Range Transmission Expansion Plan.
13. “MISO” means Midcontinent Independent System Operator.
14. “O&M” means operations and maintenance.
15. “SCR” means “Selective Catalytic Reduction.”

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.

2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement, and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.

3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.

5. The answers provided should first restate the question asked and also identify the person(s) supplying the information.

6. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the

document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a “privilege log” that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.

9. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.

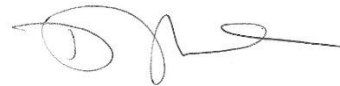
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

POST-HEARING DATA REQUESTS PROPOUNDED TO BIG RIVERS ELECTRIC CORPORATION BY JOINT INTERVENORS KENTUCKIANS FOR THE COMMONWEALTH AND KENTUCKY RESOURCES COUNCIL

- 3.1. Please refer to Joint Intervenors’ cross-examination of Company witness Mizell between approximately 3:18 p.m. and 3:21 p.m. on May 22, 2024. Identify and produce any estimate of the capital cost that would need to be expended to enable gas co-firing at the Wilson plant.
- 3.2. Please refer to Joint Intervenors’ cross-examination of Company witness Bradley between approximately 5:47 p.m. and 5:49 p.m. on May 22, 2024, and provide any comments submitted from the Company on MISO Tranche 2 LRTP.
- 3.3. Please refer to Joint Intervenors’ cross-examination of Company witness Christensen between approximately 8:05 p.m. and 8:09 p.m. on May 22, 2024, and produce any analysis, spreadsheet, or other written documentation of the scoring and/or ranking of the bids received in response to the Big Rivers’ 2022 All-Source Request for Proposals.
- 3.4. Please refer to Joint Intervenors’ cross-examination of Company witness Christensen between approximately 8:52 p.m. and 8:54 p.m. on May 22, 2024. State whether the O&M costs for the Wilson plant in Big Rivers IRP modeling included the cost of operating the SCR pollution control each day that the plant is operating, year-round.

- a. If so, please identify the cost of operating the SCR included in the O&M costs for the Wilson plant.
- b. If not, please explain why not, and identify for how many days and during which months of each year a cost of operating the SCR was included in the O&M costs for the Wilson plant, and what cost was included for those days.

Respectfully submitted,



Byron L. Gary
Ashley Wilmes
Tom FitzGerald
Kentucky Resources Council
P.O. Box 1070
Frankfort, KY 40602
(502) 875-2428
Byron@kyrc.org
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FitzKRC@aol.com

Shannon Fisk
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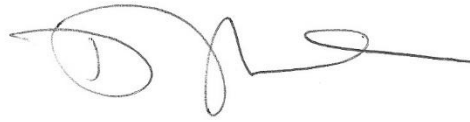
Thomas Cmar
Earthjustice
6608 Wooster Pike
Cincinnati, OH 45227
(312) 257-9338
tcmar@earthjustice.org

Mychal Ozaeta
Earthjustice
707 Wilshire Blvd., Suite 4300
Los Angeles, CA 90017
(213) 766-1069
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CERTIFICATE OF SERVICE

In accordance with the Commission’s July 22, 2021 Order in Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, this is to certify that the electronic filing was submitted to the Commission on May 31, 2024; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Tom FitzGerald