

IN THE MATTER OF:  
ELECTRONIC 2023 INTEGRATED RESOURCE PLAN OF  
BIG RIVERS ELECTRIC CORPORATION  
CASE NO. 2023-00310

BIG RIVERS ELECTRIC CORPORATION'S SUPPLEMENTAL RESPONSE TO  
KENTUCKIANS FOR THE COMMONWEALTH AND  
KENTUCKY RESOURCE COUNCIL'S FIRST REQUESTS FOR INFORMATION

**REQUEST NO. 1-40:**      *Refer to page 116 of the IRP. Produce the Big Rivers 2023-2037 Long-Term Financial Plan and any supporting workpapers and modeling input and output files, and identify the date that such Plan was created.*

**ORIGINAL RESPONSE:** Big Rivers objects to this request as overly broad, unduly burdensome, and not reasonably tailored to lead to relevant or admissible evidence.

**SUPPLEMENTAL RESPONSE:** Subject to and without waiving the objections raised in the original response, please see the CONFIDENTIAL Excel workbooks included in Big Rivers' Response and Supplemental Response to Kentuckians for the Commonwealth and Kentucky Resource Council's Request No. 1-1, which includes the assumptions relied upon for the O&M projections discussed on page 116 of the IRP.

**Witness: John Christensen (1898 & Co.)**

**For the Objection(s): Counsel**