IN THE MATTER OF: ELECTRONIC 2023 INTEGRATED RESOURCE PLAN OF

BIG RIVERS ELECTRIC CORPORATION

CASE NO. 2023-00310

BIG RIVERS ELECTRIC CORPORATION'S SECOND SUPPLEMENTAL RESPONSE TO

KENTUCKIANS FOR THE COMMONWEALTH AND

KENTUCKY RESOURCE COUNCIL'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 1-1: With regards to each modeling run carried out as part of this IRP,

including Appendices:

a. Produce all modeling input and output files (in electronic machine readable,

unprotected format with original formulas intact) for each run.

b. Produce any workbooks or workpapers, in electronic, machine readable,

unprotected format with original formulas intact, used to develop or process

inputs to the model.

c. Produce any workbooks or workpapers, in electronic, machine readable,

unprotected format with original formulas intact, used to review or process

outputs of each model run.

ORIGINAL RESPONSE: Big Rivers objects to this request as overly broad and unduly

burdensome. Subject to and without waiving the foregoing, Big Rivers states that the

CONFIDENTIAL responsive files are provided with this response, subject to a motion for

confidential treatment.

SUPPLEMENTAL RESPONSE: Upon further review of its Original Response, it

appears that some files were unintentionally omitted from the original production. Subject to and

without waiving the objections in its original response to this Request, Big Rivers is supplementing

Case No. 2023-00310

Second Supplemental Response to KFTC and KRC 1-1

IN THE MATTER OF:

ELECTRONIC 2023 INTEGRATED RESOURCE PLAN OF **BIG RIVERS ELECTRIC CORPORATION**

CASE NO. 2023-00310

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KENTUCKIANS FOR THE COMMONWEALTH AND

KENTUCKY RESOURCE COUNCIL'S FIRST REQUESTS FOR INFORMATION

its original production of CONFIDENTIAL responsive files with a complete set of the

CONFIDENTIAL responsive files subject to a motion for confidential treatment.

SECOND SUPPLEMENTAL RESPONSE: It has come to the attention 1898 & Co.

that, in connection with its modeling of the high and low natural gas price sensitives, the high and

low gas cost modifiers were inadvertently omitted. As a consequence of addressing this omission,

certain modeling results change, including with respect to the selection of alternative resources in

the Low Gas scenario (specifically, demand response programming and additional combustion

turbines are no longer favored). Subject to and without waiving the objections in its original

response to this Request, Big Rivers is supplementing its previous production of CONFIDENTIAL

responsive files with a complete set of the CONFIDENTIAL responsive files, subject to the

motions for confidential treatment filed herein January 5 and February 16, 2024.

Witness: John Christensen (1898 & Co.)

For the Objection(s): Counsel

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Witness: John Christensen

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

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

filed with this veri	fication for wh	e, and affirm that the information request responses sich I am listed as a witness are true and accurate to nation, and belief formed after a reasonable inquiry. John Christensen Senior Project Manager Burns & McDonnell Engineering Co., Inc.
STATE OF	Minnesota)
COUNTY OF	St. Louis) ss:)
SUBSCRIB // th day of // day My commiss	ED AND SWO <u>c/1</u> , 2024. sion expires:	ORN TO before me by John Christensen on this the $01/31/29$

Christa Marie Hoff
Notary Public
Minnesota
My Commission Expires 01/31/29

Notary Public

Notary ID: 1451049200039