

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. 1-9: *Refer to page 36 of the IRP.*

- a. *Produce the 2022 All Source Request for Proposals ("RFP") for generation resources.*
- b. *Explain why Big Rivers issued an RFP for generation resources in 2022.*
- c. *Produce all of the bids received in response to the 2022 RFP.*
- d. *Produce any summary, analysis, or report regarding the bids received in response to the 2022 RFP.*

ORIGINAL RESPONSE:

- a. See the attached All-Source Request for Proposals.
- b. Big Rivers chose to issue an All-Source RFP for generation resources in 2022 in order to facilitate entry into the MISO Generation Interconnection queue for 2022. This timing was necessary in order to accommodate the June 2029 service date.
- c. Big Rivers objects to this request as overly burdensome and not reasonably tailored to lead to relevant or admissible evidence.
- d. Big Rivers objects to this request as overly burdensome and not reasonably tailored to lead to relevant or admissible evidence.

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SUPPLEMENTAL RESPONSE:

c. - d. Subject to and without waiving the objections raised in the original response, Big Rivers states that a CONFIDENTIAL responsive file identifying all "short list" bids received following passage of the Inflation Reduction Act is provided with this response, subject to a motion for confidential treatment.

Witness: Nathaniel A. Berry (for subparts a & b)

John Christensen (1898 & Co.) (for subparts c & d)

For the Objection(s): Counsel