

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

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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

