

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

BIG RIVERS ELECTRIC CORPORATION'S RESPONSES TO
KENTUCKIANS FOR THE COMMONWEALTH AND KENTUCKY RESOURCES
COUNCIL'S POST-HEARING DATA REQUESTS

REQUEST NO. PH-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.*

RESPONSE: Big Rivers has not prepared or obtained written estimates or proposals reflecting the projected capital costs associated with enabling gas co-firing at Wilson. However, discussions with interstate natural gas pipelines have indicated that necessary pipeline infrastructure upgrades would be significant and costly. In light of this fact, and considering the replacement of Wilson's FGD had been approved by the Commission and was then in progress, Big Rivers did not further pursue an evaluation of the full panoply of projected costs (*e.g.*, station upgrades, administrative costs, etc.) required to enable gas co-firing at Wilson.

Witness: Jason Burden

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

BIG RIVERS ELECTRIC CORPORATION'S RESPONSES TO
KENTUCKIANS FOR THE COMMONWEALTH AND KENTUCKY RESOURCES
COUNCIL'S POST-HEARING DATA REQUESTS

REQUEST NO. PH-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.*

RESPONSE: Big Rivers submitted comments to the MISO anticipated portfolio for Tranche 2 of the Long Range Transmission Plan (LRTP). The following screenshot was taken from the MISO public website at:

<https://www.misoenergy.org/engage/stakeholder-feedback/2024/lrtp-tranche-2-anticipated-portfolio-20240315/>

Big Rivers Electric Corporation Submitted by Jeff Fulkerson

Posted - 04/4/2024

Big Rivers physical location is in the southern portion of MISO's central region along a north-south regional seam. This area currently has minimal Tranche 2 project support. However, projects in this area can benefit the MISO Region, while following MISO's objective of improving reliability and transfer capability; reducing congestion; and supporting decarbonization. These benefits will improve the reliability and resilience of the power grid transformation in the MISO region while ensuring a more stable and consistent electrical supply. Therefore, Big Rivers encourages MISO to reconsider the following concepts as part of LRTP Tranche 2 Portfolio:

Concept 1: F. B. Culley - Reid EHV 345 kV Line

Concept 2: Joppa(McCracken Area) - Reid EHV 345 kV Line

Witness: Christopher S. Bradley

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

BIG RIVERS ELECTRIC CORPORATION'S RESPONSES TO
KENTUCKIANS FOR THE COMMONWEALTH AND KENTUCKY RESOURCES
COUNCIL'S POST-HEARING DATA REQUESTS

REQUEST NO. PH-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.*

RESPONSE: Big Rivers objects to this request as overly burdensome and not reasonably tailored to lead to relevant or admissible evidence. Please see Big Rivers' Response to Kentuckians for the Commonwealth/Kentucky Resource Council Request No. 1-9(d). Subject to and without waiving these objections, please see the attachment to Big Rivers' response to Item No. 1 of Commission Staff's Post-Hearing Request for Information, RFP Shortlisted Proposal Summary prior to passage of the Inflation Reduction Act.

Witness: John Christensen (1898 & Co.)

For the Objection(s): Counsel

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

BIG RIVERS ELECTRIC CORPORATION'S RESPONSES TO
KENTUCKIANS FOR THE COMMONWEALTH AND KENTUCKY RESOURCES
COUNCIL'S POST-HEARING DATA REQUESTS

REQUEST NO. PH-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.*

RESPONSE: The fixed and variable O&M costs provided to 1898 & Co. for its modeling included the cost of operating the SCR pollution control each day that the plant is operating.

- a. The annual fixed and variable O&M costs for operating the Wilson SCR are provided in the CONFIDENTIAL table below.

Year	\$	Year	\$
2023		2037	
2024		2038	
2025		2039	
2026		2040	
2027		2041	
2028		2042	
2029		2043	
2030		2044	
2031		2045	
2032		2046	
2033		2047	
2034		2048	
2035		2049	
2036		2050	

b. N/A.

Witness: Christopher A. Warren

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

BIG RIVERS ELECTRIC CORPORATION'S RESPONSES TO KENTUCKIANS FOR THE
COMMONWEALTH AND KENTUCKY RESOURCE COUNCIL'S
POST-HEARING REQUESTS FOR INFORMATION

I, Christopher Bradley, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

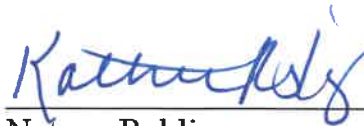


Christopher Bradley
Vice President System Operations
Big Rivers Electric Corporation

STATE OF KENTUCKY)
) ss:
COUNTY OF DAVIESS)

18th SUBSCRIBED AND SWORN TO before me by Christopher Bradley on this the
day of June, 2024.

My commission expires: October 31, 2024



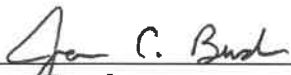
Notary Public

Notary ID: KYNP16841

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

BIG RIVERS ELECTRIC CORPORATION'S RESPONSES TO KENTUCKIANS FOR THE
COMMONWEALTH AND KENTUCKY RESOURCE COUNCIL'S
POST-HEARING REQUESTS FOR INFORMATION

I, Jason Burden, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

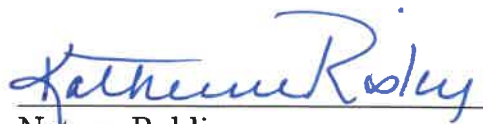


Jason Burden
Director of Production Services
Big Rivers Electric Corporation

STATE OF KENTUCKY)
) ss:
COUNTY OF DAVIESS)

SUBSCRIBED AND SWORN TO before me by Jason Burden on this the 18th
day of June, 2024.

My commission expires: October 31, 2024



Katherine Riley
Notary Public
Notary ID: KYNP16841

