

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of: ELECTRONIC 2023 :
INTEGRATED RESOURCE PLAN OF BIG RIVERS : Case No. 2023-00310
ELECTRIC CORPORATION. :

**SUPPLEMENTAL POST-HEARING COMMENTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Kentucky Industrial Utility Customers, Inc. (“KIUC”) submits the following Supplemental Post-Hearing Comments on Big Rivers Electric Corporation’s (“Big Rivers” or “Company”) 2023 Integrated Resource Plan (“IRP”). In its March 8, 2024 Comments, KIUC explained that: 1) Big Rivers’ plan to construct a new 635 MW natural gas combined cycle (“NGCC”) plant is a reasonable and practical solution to address its future system needs; and 2) Big Rivers’ unilateral decision to modify its standby service load forecasting methodology is unreasonable and will unnecessarily increase members’ rates by \$104.7 million to \$237.7 million by accelerating the need for new generation. KIUC stands behind these comments.

However, at the hearing in this case, Big Rivers Chief Financial Officer, Talina Matthews, indicated that given recent leadership changes at the Company, Big Rivers will be developing its next IRP using an entirely new strategic plan and “*will be looking at all available options.*”¹ Big Rivers’ 2023 IRP therefore may already be “*stale*” with respect to the proposed 635 MW NGCC. But KIUC’s recommendation with respect to the treatment of standby load for purposes of the IRP load forecast remains. Consistent with Big Rivers’ historic practice and in order to protect customers from unnecessary rate increases, Big Rivers should be required to reflect the net load (rather than gross load) of standby service customers in the next IRP load forecast.

¹ Tr. (May 22, 2024) at 11:37:56 am.

Respectfully submitted,

/s/ Michael L. Kurtz

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