



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

ELECTRONIC APPLICATION OF)	
BIG RIVERS ELECTRIC CORPORATION)	Case No.
FOR ANNUAL REVIEW OF ITS MRSM)	2024-00031
CHARGE FOR CALENDAR YEAR 2023)	

**Big Rivers Electric Corporation's
Response to the Commission Staff's
First Request for Information**

**Dated
April 17, 2024**

FILED: May 1, 2024

BIG RIVERS ELECTRIC CORPORATION

**ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION FOR ANNUAL REVIEW
OF ITS MRSM CHARGE FOR CALENDAR YEAR 2023
CASE NO. 2024-00031**

**BIG RIVERS ELECTRIC CORPORATION'S RESPONSES TO COMMISSION
STAFF'S FIRST REQUEST FOR INFORMATION**

VERIFICATION

I, Talina R. Mathews, 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 and belief formed after a reasonable inquiry.



Talina R. Mathews

COMMONWEALTH OF KENTUCKY)
COUNTY OF DAVIESS)

30th SUBSCRIBED AND SWORN TO before me by Talina R. Mathews on this the
day of April 2024.



Notary Public, Kentucky State at Large

Kentucky ID Number KYNP16841

My Commission Expires October 31, 2024

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR ANNUAL REVIEW OF ITS MRSM CHARGE
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May 1, 2024

1 **Item 1)** *Refer to the Application, page 20. Provide the calculation for the*
2 *proposed minimum TIER Credit Regulatory Liability balance of \$12.4*
3 *million.*

4

5 **Response)** The proposed minimum TIER Credit Regulatory Liability balance of
6 \$12.4 million is calculated by multiplying the 2024 projected interest expense of \$41.4
7 million by 0.30 to arrive at a 1.30 TIER or \$12.4 million.

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10 **Witness)** Talina R. Mathews

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1 **Item 2)** *Refer to the Application, the Direct Testimony of Talina R.*
2 *Mathews (Mathews Direct Testimony), Exhibit Mathews-2, Exhibit Mathews-*
3 *3, Exhibit Mathews-4, and Exhibit Mathews-5. Provide these exhibits in Excel*
4 *spreadsheet format with all formulas, columns, and rows unprotected and*
5 *fully accessible.*

6

7 **Response)** Please see Exhibits Mathews-3, Mathews-4, and Mathews-5 in Excel
8 spreadsheet format attached to this response; and the confidential Exhibit
9 Mathews-2 in Excel spreadsheet format filed with Big Rivers' Motion for Confidential
10 Treatment.

11

12

13 **Witness)** Talina R. Mathews

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1 **Item 3)** *Refer to the Application, Mathews Direct Testimony, page 12.*

2 *Provide the estimated simple margins provided by Nucor Corporation in*

3 *2023.*

4

5 **Response)** Estimated simple margins provided by Nucor Corporation in 2023 were

6 \$3,978,000.

7

8

9 **Witness)** Talina R. Mathews

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1 **Item 4)** *Provide the balance of the TIER Credit Regulatory Liability at*
2 *the beginning of 2023, the end of 2023, and the excess balance for 2023.*

3

4 **Response)** As of January 1, 2023, the TIER Credit Regulatory balance was \$9.0
5 million. As of December 31, 2023, the TIER Credit Regulatory balance increased to
6 \$11.3 million. The 2023 excess TIER Credit was \$15.5 million.

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9 **Witness)** Talina R. Mathews