



**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**In the Matter of:**

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

**Big Rivers Electric Corporation's Response  
to the Office of the Attorney General's**

**Initial Data Request**

**Dated**

**April 15, 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 THE OFFICE  
OF THE ATTORNEY GENERAL'S INITIAL DATA REQUESTS**

**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**  
**FOR CALENDAR YEAR 2023**  
**CASE NO. 2024-00031**

**Response to the Office of the Attorney General's**  
**Initial Data Requests**  
**dated April 15, 2024**

**May 1, 2024**

1 **Item 1)**      *See Exhibit 2 to the Testimony of Dr. Talina Matthews, Ph. D.*  
2 *Please provide an estimate of the monthly bill impact for a residential*  
3 *customer (of typical usage) served by one of BREC's member distribution*  
4 *cooperatives resulting from the rural monthly credits. Detail all relevant*  
5 *assumptions.*

6

7 **Response)** The bill impact in 2024, for all rural customers, including residential,  
8 will depend on the actual usage each month. Assuming the 2024 rural sales volume  
9 is the same as 2023 (2,098,136 MWhs), the average residential customer bill credit  
10 will be approximately \$3.76 per MWh (\$7.9 million / 2.1 million MWhs), or  
11 approximately \$50.90 for the year 2024, or approximately \$4.24 monthly (assuming  
12 Kenergy's 2023 average residential usage of 1,128 kWh per month).

13

14

15 **Witness)**      Talina R. Mathews

**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**

**Response to the Office of the Attorney General's**  
**Initial Data Requests**  
**dated April 15, 2024**

**May 1, 2024**

1 **Item 2)**      *Provide a review of the bill credits allocated to ratepayers since*  
2 *the modification of the MRSM in Case No. 2020-00064, including:*

3      *a.      The total bill credits allocated by customer class; and*

4      *b.      A calculation of the cumulative bill impact for a residential*  
5 *customer (of typical usage) served by one of BREC's member*  
6 *distribution cooperatives resulting from the rural monthly*  
7 *credits.*

8 *List all relevant assumptions.*

9

10 **Response)**

11      a.      The total bill credits allocated by customer class, since the modification  
12      of the MRSM in Case No. 2020-00064 is provided in the following table.

**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**

**Response to the Office of the Attorney General's**  
**Initial Data Requests**  
**dated April 15, 2024**

**May 1, 2024**

1

For year ending:	2020	2021	2022	2023	Cumulative
Bill credit year:	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	
(\$ in millions)					
Rural	\$ 10.5	\$ 14.2	\$ 9.2	\$ 7.9	41.8
Large Industrial	2.8	3.6	2.5	2.4	11.3
<b>Total</b>	<b>\$ 13.3</b>	<b>\$ 17.8</b>	<b>\$ 11.7</b>	<b>\$ 10.3</b>	<b>53.1</b>

2

3

4

5

6

7

8

9

10

11

12

13

b. The cumulative bill impact through 2024, for all rural customers, including residential, will depend on the actual usage in 2024. Assuming the 2024 rural sales volume is the same as 2023 (2,098,136 MWhs), the cumulative rural sales volume for 2021 through 2024 is 8,684,076 MWhs. With cumulative Rural bill credits for 2021-2024 billing periods of \$41,822,963, the cumulative average residential customer bill credit is approximately \$4.80 per MWh (\$41.8 million / 8.7 million MWhs). The cumulative bill impact through the end of 2024 for a residential customer (of typical usage) served by one of BREC's member distribution cooperatives, Kenergy, resulting from the rural monthly credits is approximately \$276.71 (assuming Kenergy's average

**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**

**Response to the Office of the Attorney General's**  
**Initial Data Requests**  
**dated April 15, 2024**

**May 1, 2024**

1                   2021-2024 residential usage of 1,201 kWh per month with 2024 utilizing  
2                   2023 information in the calculation).

3

4

5 **Witness)**   Talina R. Mathews

**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**

**Response to the Office of the Attorney General's**  
**Initial Data Requests**  
**dated April 15, 2024**

**May 1, 2024**

1 **Item 3)** *Provide a summary of changes in the balances for the Smelter*

2 *Loss Mitigation accounts since the modification of the MRSM.*

3

4 **Response)** Please see the attachment to this response, showing the changes in

5 balances for the Smelter Loss Mitigation accounts since the modification of the

6 MRSM.

7

8

9 **Witness)** Talina R. Mathews

**BIG RIVERS ELECTRIC CORPORATION  
CASE NO. 2024-00031**

**SMELTER LOSS MITIGATION REGULATORY ASSET SCHEDULE**

<b>Smelter Loss Mitigation Regulatory Assets</b>							
	<b>Focused Mgmt Audit</b>	<b>Wilson Station Deferred Depr</b>	<b>Coleman Station Deferred Depr</b>	<b>Reid Station Unit 1 Decommission</b>	<b>Station Two Decommission</b>	<b>Coleman Station Decommission</b>	<b>Total</b>
1/1/2020 Balance	675,904.13	120,543,842.56	9,502,057.65	-	90,423,767.18	-	221,145,571.52
Write-Off DSM Liability	(675,904.13)	(28,935.00)	-	-	-	-	(704,839.13)
Monthly Deferred Depreciation	-	20,838,499.66	4,367,882.82	-	-	-	25,206,382.48
Retire Reid Unit 1	-	-	-	7,769,051.26	-	-	7,769,051.26
Retire Station Two	-	-	-	-	1,677,822.43	-	1,677,822.43
Retire Coleman Station	-	-	-	-	-	129,868,683.94	129,868,683.94
1/1/2021 Balance	-	141,353,407.22	13,869,940.47	7,769,051.26	92,101,589.61	129,868,683.94	384,962,672.50
Monthly Amortization	-	(13,044,248.40)	-	-	-	-	(13,044,248.40)
Equity Headroom Write-Off	-	(84,944,959.00)	-	-	-	-	(84,944,959.00)
2020 Excess TIER Credit	-	(11,000,271.53)	-	-	-	-	(11,000,271.53)
Retire Reid Unit 1	-	-	-	1,573,297.39	-	-	1,573,297.39
Retire Station Two	-	-	-	-	855,134.75	-	855,134.75
Retire Coleman Station	-	-	-	-	-	2,746,055.29	2,746,055.29
1/1/2022 Balance	-	32,363,928.29	13,869,940.47	9,342,348.65	92,956,724.36	132,614,739.23	281,147,681.00
Monthly Amortization	-	(6,522,124.20)	(6,522,124.20)	-	-	-	(13,044,248.40)
2021 Excess TIER Credit	-	(25,841,804.09)	(883,961.16)	-	-	-	(26,725,765.25)
Retire Reid Unit 1	-	-	-	103,749.02	-	-	103,749.02
Retire Station Two	-	-	-	-	1,041,005.49	-	1,041,005.49
Retire Coleman Station	-	-	-	-	-	1,543,785.09	1,543,785.09
1/1/2023 Balance	-	(0.00)	6,463,855.11	9,446,097.67	93,997,729.85	134,158,524.32	244,066,206.95
Monthly Amortization	-	-	(6,463,855.11)	(3,319,331.19)	(3,261,062.10)	-	(13,044,248.40)
2022 Excess TIER Credit	-	-	-	(6,143,140.90)	(11,422,916.93)	-	(17,566,057.83)
Retire Reid Unit 1	-	-	-	16,374.42	-	-	16,374.42
Retire Station Two	-	-	-	-	461,988.69	-	461,988.69
Retire Coleman Station	-	-	-	-	-	600,936.14	600,936.14
<b>12/31/2023 Balance</b>	<b>-</b>	<b>(0.00)</b>	<b>0.00</b>	<b>0.00</b>	<b>79,775,739.51</b>	<b>134,759,460.46</b>	<b>214,535,199.97</b>