



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)	2025-00021
CHARGE FOR CALENDAR YEAR 2024)	

**Big Rivers Electric Corporation's
Response to the Commission Staff's**

First Request for Information

Dated

March 25, 2025

FILED: April 8, 2025

BIG RIVERS ELECTRIC CORPORATION

**ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION FOR ANNUAL REVIEW
OF ITS MRSM CHARGE FOR CALENDAR YEAR 2024
CASE NO. 2025-00021**

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

VERIFICATION


I, Michael S. Mizell, 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.



Michael S. Mizell

COMMONWEALTH OF KENTUCKY)
COUNTY OF DAVIESS)

7th SUBSCRIBED AND SWORN TO before me by Michael S. Mizell on this the
day of April 2025.



Notary Public, Kentucky State at Large
Kentucky ID Number KYDP16841
My Commission Expires October 31, 2029

BIG RIVERS ELECTRIC CORPORATION

**ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION FOR ANNUAL REVIEW
OF ITS MRSM CHARGE FOR CALENDAR YEAR 2024
CASE NO. 2025-00021**

**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)

7th SUBSCRIBED AND SWORN TO before me by Talina R. Mathews on this the
day of April 2025.



Notary Public, Kentucky State at Large

Kentucky ID Number KYNP16841

My Commission Expires October 31, 2028

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR ANNUAL REVIEW OF ITS MRSM CHARGE
FOR CALENDAR YEAR 2024
CASE NO. 2025-00021

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April 8, 2025

1 **Item 1)** *Refer to the Application, the Direct Testimony of Talina R. Mathews*
2 *(Mathews Direct Testimony), Exhibit Mathews-2, Exhibit Mathews-3, Exhibit*
3 *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

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
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1 **Item 2)** *Refer to the Direct Testimony of Michael S. Mizell (Mizell Direct*
2 *Testimony) at 4. Explain whether BREC anticipates any changes to the coal*
3 *combustion residual legacy rule. If so, explain the potential changes and*
4 *whether this would affect any of BREC's plans for the closure of legacy ponds.*

5

6 **Response)** Lee Zeldin, EPA Administrator, announced on March 12, 2025 that the
7 United States Environmental Protection Agency will be reconsidering several
8 formally promulgated rules including the coal combustion residual (CCR) legacy rule.
9 The first anticipated action by the EPA is to delay regulatory deadlines for CCR
10 legacy ponds and CCR management units while the new EPA administration
11 performs a formal review of the 2024 rule. Other than delaying deadlines in the new
12 rule, it is difficult to predict what regulatory changes, if any, will be made. BREC
13 will continue to review information provided by the new EPA administration to better
14 understand potential changes to the rule that could impact BREC's future plans.

15

16 **Witness)** Michael S. Mizell

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1 **Item 3)** *Refer to the Application, page 4. Provide the calculation for the*
2 *proposed minimum TIER Credit Regulatory Liability balance of \$15.5*
3 *million.*

4

5 **Response)** The \$15.5 million referenced on page 4 of the application is not a
6 “proposed minimum TIER Credit Liability balance,” but instead relates to the \$15.5
7 million used in 2024, by Big Rivers to reduce its SLM Regulatory Assets. This amount
8 was derived from 60% of the 2023 margins in excess of a 1.30 TIER, which were \$25.9
9 million.

10

11

12 **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 2024, the end of 2024, and the excess balance for 2024.*

3

4 **Response)** As of January 1, 2024, the TIER Credit Regulatory balance was \$11.3
5 million. As of December 31, 2024, the TIER Credit Regulatory balance increased to
6 \$12.4 million. The 2024 excess TIER Credit was \$4.2 million.

7

8

9 **Witness)** Talina R. Mathews