



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT CLAUSE)	Case No.
OF BIG RIVERS ELECTRIC CORPORATION FROM)	2025-00078
NOVEMBER 1, 2023 THROUGH APRIL 30, 2024)	

Responses to Commission Staff's Second Request for Information
dated July 3, 2025

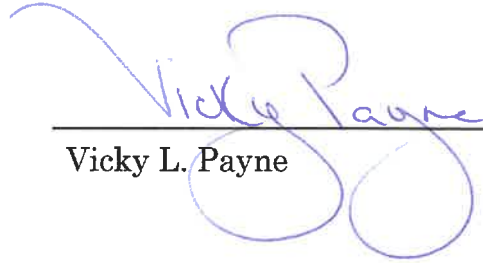
FILED: July 18, 2025

BIG RIVERS ELECTRIC CORPORATION

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2023 THROUGH APRIL 30, 2024
CASE NO. 2025-00078**

VERIFICATION

I, Vicky L. Payne, verify, state, and affirm that the data 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.



Vicky L. Payne

COMMONWEALTH OF KENTUCKY)
COUNTY OF DAVIESS)

16th SUBSCRIBED AND SWORN TO before me by Vicky L. Payne on this the
day of July, 2025.



Notary Public, Kentucky State at Large

Kentucky ID Number

KYNP16841

My Commission Expires

October 31, 2028

BIG RIVERS ELECTRIC CORPORATION

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FROM NOVEMBER 1, 2023 THROUGH APRIL 30, 2024
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VERIFICATION

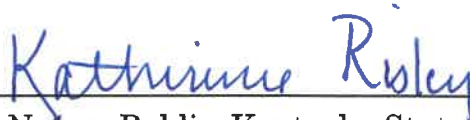
I, Jeffrey S. Brown, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Jeffrey S. Brown

COMMONWEALTH OF KENTUCKY)
COUNTY OF DAVIESS)

16th SUBSCRIBED AND SWORN TO before me by Jeffrey S. Brown on this the
day of July 2025.



Notary Public, Kentucky State at Large

Kentucky ID Number

KYNP16891

My Commission Expires

October 31, 2028

BIG RIVERS ELECTRIC CORPORATION

**AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL
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FROM NOVEMBER 1, 2023 THROUGH APRIL 30, 2024
CASE NO. 2025-00078**

VERIFICATION

I, Rebecca ("Becky") Shelton, verify, state, and affirm that the data 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.



Rebecca ("Becky") Shelton

COMMONWEALTH OF KENTUCKY)
COUNTY OF DAVIESS)

SUBSCRIBED AND SWORN TO before me by Rebecca ("Becky") Shelton on this the 16th day of July, 2025.



Notary Public, Kentucky State at Large

Kentucky ID Number

KYNP16891

My Commission Expires

October 31, 2028

BIG RIVERS ELECTRIC CORPORATION
AN ELECTRONIC EXAMINATION OF THE
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FROM NOVEMBER 1, 2023 THROUGH APRIL 30, 2024
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Responses to Commission Staff's Second Request for Information
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1 Item 1) *Refer to BREC's response to Commission Staff's First Request for*
2 *Information (Staff's First Request), Item 3.*

3 a. *Explain the meaning of "Duration (In Days)" and how that is*
4 *calculated.*

5 b. *If BREC's target Supply Inventory is 30-60 days and the actual coal*
6 *inventory exceeded the target inventory by ten days, explain how BREC*
7 *arrived at ten days above target when it calculated 218 days' supply.*

8 **Response)**

9 a. The "Duration (In Days)" is calculated by taking the total number of In-
10 Service hours for the unit during the review period, November 1, 2023 through
11 April 30, 2024, which totaled 3,341.5 hours. The number is then divided by 24
12 hours to convert to days (3,341.5 hours / 24 hours = 139.23 days) and rounded
13 to the 139 duration days shown in Big Rivers' response.

14 b. The total tons of coal on the ground the last day of the review period, April 30,
15 2024 totaled 896,380.18 tons. The total tons burned during the review
16 period, November 1, 2023 through April 30, 2024, equal 572,920.52 tons.

17 The final calculation takes tons on the ground, multiplied by duration
18 days in service, then divided by total burn for review period. The calculation is

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1 as follows: $((896,380.18 \text{ tons} \times 139.23 \text{ days}) / 572,920.52 \text{ tons} = 217.8365 \text{ days})$.
2 The total days' supply is 218 days, if every ton on the ground burned based on
3 the tonnage burned during the review period, November 1, 2023 through April
4 30, 2024, as shown in Big Rivers' response to Item 3(a) of Commission Staff's
5 First Request for Information.

6 Consistent with Big Rivers' prior responses in previous FAC reviews to
7 subpart d of this standard request, the response restates the request by stating
8 that actual inventory did exceed the target inventory shown in Big Rivers'
9 response to subpart c by 10 days and then states the reason for the excess
10 inventory.

11

12 **Witness) Vicky L. Payne**

13

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- 1 **Item 2)** *Refer to BREC's response to Staff's First Request, Item 7.*
- 2 *a.* *Explain whether BREC has considered adding dual fuel capability to*
- 3 *its combustion turbines (CTs).*
- 4 *b.* *To the extent that the interstate gas pipelines had trouble delivering*
- 5 *gas to BREC's CT's, explain whether the pipeline issues were resolved*
- 6 *and whether BREC is satisfied that the issues have been resolved*
- 7 *sufficiently.*

8

9 **Response)**

- 10 a. The Robert A. Reid Combustion Turbine ("Reid CT") went into service in
- 11 March of 1976 as a fuel oil unit and was retrofitted to a dual-fueled unit, to
- 12 burn natural gas as well. As the unit aged, Big Rivers decided to maintain the
- 13 unit to burn solely natural gas. As the Commission is aware, the Reid CT
- 14 suffered a catastrophic forced outage in August of 2024 and Big Rivers has
- 15 submitted a notice of intent to retire the Reid CT to the Energy Planning and
- 16 Inventory Commission (EPIC). There are no other CTs in Big Rivers' resource
- 17 portfolio.

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1 The generating units at the Robert D. Green generating station ("Green
2 Station"), are boiler/turbine natural gas units not CTs but are also referenced
3 in BREC's response to Staff's First Request, Item 7. The Green Station's units
4 began operating in 1979 and 1981 respectively as coal-fired units and were
5 converted to burn natural gas in 2022, continuing to utilize the original steam
6 turbines. The Green units were converted from coal-fired to extend operation
7 of the units until 2029 and avoid the risk of purchasing capacity from the MISO
8 market. As such the costs of the conversion project were depreciated over seven
9 years. While the Green units may be operational past 2029, providing
10 additional benefit to the Members, Big Rivers has not considered adding dual
11 fuel capability to these units.

- 12 b. As stated in response to Item No. 7 of Staff's First Request, natural gas supply
13 was unavailable for Big Rivers' gas generating units during Winter Storm
14 Heather. Texas Gas did not provide details of any specific operational issues
15 that the pipelines experienced during the storm. Once the storm passed, Big
16 Rivers has not experienced any issues with gas supply availability.

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1

2 Witnesses) Jeffrey S. ("Jeff") Brown, subpart a

3

Vicky L. Payne, subpart b

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1 **Item 3)** *Refer to BREC's response to Staff's First Request, Item 15,*
2 *Attachment. For the Green Station Unit #2, explain the meaning of*
3 *"Differential expansion of turbine."*

4

5 **Response)** Steam turbines rely on very small axial clearances between the blades
6 of the turbine rotor and stationary diaphragms within the casing. Differential
7 expansion in a turbine refers to the difference in thermal expansion between the
8 turbine rotor and the turbine casing. As the turbine heats up during operation, both
9 the rotor and casing expand, but at different rates due to variation in material
10 properties, mass, etc. If the differential expansion is not controlled, it can lead to
11 contact between the rotor and casing causing severe damage. The events explained
12 as "differential expansion of turbine" in Big Rivers' response to Item 15 of the Staff's
13 First Request for Green Unit #2 occurred during startup of the unit when differential
14 expansion resulted in a trip of the unit to protect the turbine and outage hours to
15 allow the turbine to cool.

16

17 **Witness)** **Jeffrey S. ("Jeff") Brown**

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- 1 Item 4) *Refer to BREC's response to Staff's First Request, Item 17,*
2 *Attachment.*
- 3 a. *Confirm that BREC does not purchase firm gas pipeline transportation*
4 *for its Reid and Green units. If not confirmed, explain the response.*
- 5 b. *During the review period, except for the short period when Texas Gas*
6 *experienced problems during the winter storm, explain whether there*
7 *were any instances when BREC could purchase gas but could not*
8 *purchase sufficient transportation capacity to the city gate.*
- 9 c. *In terms of unit availability, explain if MISO treats BREC's gas units*
10 *as available if there is not sufficient pipeline capacity to transport*
11 *purchased gas to the city gate.*
- 12 d. *Explain whether BREC purchases pipeline capacity the day ahead in*
13 *the same way it purchases spot gas. If not, explain how the purchases*
14 *of the gas commodity and pipeline transportation capacity are*
15 *coordinated.*
- 16

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1 Response)

- 2 a. Confirmed. Big Rivers does not purchase firm gas pipeline transportation for
3 its Reid and Green units.
- 4 b. There were no other known instances during the review period when Big
5 Rivers could purchase gas but could not purchase sufficient transportation
6 capacity.
- 7 c. MISO views availability of these units based on the status of Big Rivers' daily
8 generation submission. Each day, Big Rivers' natural gas fueled units are
9 submitted into the MISO market based on operational status. If natural gas
10 cannot be procured and delivered to the plant, the units would be submitted
11 on outage.
- 12 d. Big Rivers does not purchase pipeline capacity for day ahead on the daily
13 market. Natural gas is procured and delivered daily on an interruptible
14 transportation contract with Texas Gas Transmission, LLC ("Texas Gas").
15 Once Big Rivers knows that MISO has called for the units to run, ACES is
16 notified and their gas trader will procure gas. Then their gas scheduler
17 contacts the shipper's scheduler and they exchange contract information and
18 a nomination is submitted on Texas Gas' system. The nomination that is

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1 submitted references Big Rivers' meter number and information, which
2 informs the pipeline where the gas needs to go and its origin.

3

4 **Witnesses)** **Vicky L. Payne, subparts a, b and d**

5 **Thomas L. Melton, subpart c**

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- 1
2 Item 5) *Refer to BREC's response to Staff's First Request, Item 16,*
3 *Attachment, Tab Form B Fuel Burned 11.2023.*
- 4 *a. Explain the difference between Gross KWH and True NET KWH.*
5 *b. Confirm that row 13 Gas Turbine refers to the Reid Unit. If not,*
6 *explain which unit row 13 references.*
7 *c. For row 13 Gas Turbine, explain whether 115,580 kWh or 26,710*
8 *kWh was actually transmitted into the MISO energy market.*
9 *d. Also, refer also to BREC's response to Staff's First Request, Item*
10 *15. For the 77.20 hours that the Wilson Station Unit #1 was in*
11 *forced outage status, explain whether the \$265.191 per MWh high-*
12 *cost unit calculation was applied to the energy purchased as a*
13 *result of the Wilson unit's forced outage.*
14 *e. Explain the economic reasons that over the review period, the*
15 *Reid and Green units were hardly dispatched in the MISO energy*
16 *market. Include in the response how these units are being bid*
17 *into the day ahead energy market, i.e., must run, economic, etc.*

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1

2 **Response)**

3 a. "Gross kWh" refers to the total amount of electricity generated at the
4 terminals of the generator before any deductions of power utilized for the
5 plant's auxiliary equipment. "True Net kWh" is the useful electrical power
6 transmitted to the grid after deducting the plant's auxiliary equipment load.
7 Net generation represents the electricity that is available for distribution
8 and consumption by the public.

9 b. Yes. The referenced "Gas Turbine" refers to the Reid Unit ("Reid CT").

10 c. 26,710 kWh was sold in MISO energy market. Please see the response to
11 subpart a, above.

12 d. The cost of purchased power during Wilson's forced outage period in
13 November 2023, was economic as it did not exceed the highest cost available
14 unit. It was the purchased power cost used in the calculation of the FAC
15 factor.

16 e. Big Rivers offered the natural gas fueled units in the MISO market as
17 Economic on the daily generation offer schedule, except when the units

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1 were on outage. The Reid CT and Green units were dispatched when called
2 upon by MISO.

3

4 **Witnesses) Jeffrey S. ("Jeff") Brown, subpart a**

5 **Rebecca ("Becky") Shelton, subparts b and c**

6 **Thomas L. Melton, subparts d and e**

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1 Item 6) *Refer to BREC's Fuel Adjustment Clause (FAC) form B filing for*
2 *the expense month of November 2023, page 1 of 18, footnote 1.*

3 a. *Explain in detail the "barge repair invoices" mentioned.*

4 b. *Provide the invoices that are referenced in the footnote.*

5

6 **Response)**

7 a. Big Rivers currently leases 30 barges for transporting coal on the
8 river. Maintenance repairs must be made from time to time for various
9 reasons, such as damage from debris in the water, general wear and
10 tear, thinning or cracks needing welding. Barges are required to
11 always remain "seaworthy" to prevent safety incidents, coal spillage,
12 sinking, etc.

13 b. Please see the attached copy of the invoices.

14

15 **Witness) Vicky L. Payne**

16



Attn: Sheila
Evansville Marine Service
PO Box 6048
Evansville, IN 47719

Phone: 812-424-9278

Email: [REDACTED]

Invoice # 2-654574
11/15/2023
CUSTOMER#: BREC

Big River Electric Corp
710 West 2nd St
PO Box 20015
Owensboro, KY 42301

Equipment	Asset	Service	Fr/At-To	Start	Qty	Rate	Fuel	Water	Amount
AEP856	MV JAMES S	Repair	► Dade Park	08/15 00:00 08/15	-	779.58	---	0.00	779.58

Invoice Note:

Detail sheets are in Attached files.

Summary	
Total	779.58
Fuel Total:	0.00
High Water Total:	0.00

Total Amount Due: \$ 779.58

On the above date(s) we were the temporary custodian of your vessel(s) listed above. A courtesy routine visual inspection was performed pursuant to the owner/operators vessel general permit(s). Any non-conformities were relayed through other reporting and/or documentation means. Thank you for your business, Robert R. Aldrich.

Please Remit To: Evansville Marine Service, Inc. PO Box 6048 Evansville, IN 47719-0048

Vicky
Payne

Digitally signed by: Vicky Payne
DN: CN = Vicky Payne email =
Vicky.Payne@bigrivers.com C = US
O = Big Rivers Electric Corporation
OU = BREC
Date: 2023.11.16 08:01:19 -06'00'



Attn: Sheila
Evansville Marine Service
PO Box 6048
Evansville, IN 47719

Phone: 812-424-9278

Email: [REDACTED]

Invoice # 2-654575
11/15/2023
CUSTOMER#: BREC

Big River Electric Corp
710 West 2nd St
PO Box 20015
Owensboro, KY 42301

Equipment	Asset	Service	Fr/At-To	Start	Qty	Rate	Fuel	Water	Amount
AEP875	MV JAMES S	Repair	► Dade Park	08/15 00:00 08/15	-	938.30	---	0.00	938.30

Invoice Note:

Detail sheets are in Attached files.

Summary	
Total	938.30
Fuel Total:	0.00
High Water Total:	0.00

Total Amount Due: \$ 938.30

On the above date(s) we were the temporary custodian of your vessel(s) listed above. A courtesy routine visual inspection was performed pursuant to the owner/operators vessel general permit(s). Any non-conformities were relayed through other reporting and/or documentation means. Thank you for your business, Robert R. Aldrich.

Please Remit To: Evansville Marine Service, Inc. PO Box 6048 Evansville, IN 47719-0048

Vicky
Payne

Digitally signed by: Vicky Payne
DN: CN = Vicky Payne email =
Vicky.Payne@bigrivers.com C = US
O = Big Rivers Electric Corporation
OU = BREC
Date: 2023.11.16 08:02:54 -06'00'

**E. M. S. GREEN RIVER, TOPSIDE REPAIR,
10098 TILLMAN-BETHEL RD.
HENDERSON, KY 42420**

Barge Repair Sheet

Barge # **AEP-875**

Date

Start, 08-15-23

End, 08-15-23

Customer, **BREC,**

Comments

Labor, 6 Hours at 80.00 Per Hour,

480.00

Competent Person, Metered for hot work,

150.00

Materials, Steel & Welding rods,

26.16

Tug service + Fuel escalator,

386.40

Price,

1,042.56

Total price at 10% Discount,

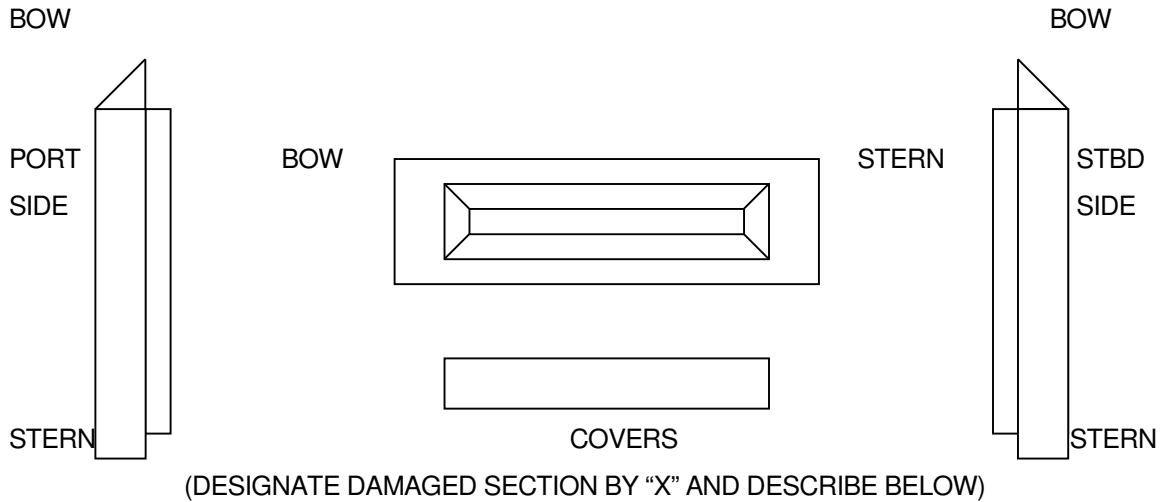
938.30

EMS, GREEN RIVER, TOPSIDE REPAIR,
10098 TILLMAN-BETHEL RD.
HENDERSON, KY 42420

Barge Condition and Damage Report

Barge Number: AEP - 875

Date, (Start, 08-15-23) (End, 08-15-23)



Topside Repair,

We repaired this barge in the Camp fleet.

Hull,

#3, Wing tank port side-sheet at the four-foot draft we patched one hole (1) 8" x 8" x 1/4" formed plate.

#3, Wing tank starboard side-sheet at the two-foot draft we scarfed out and welded one crack totaling 12" times four passes.

#4, Wing tank port side-sheet at the four-foot draft we patched one hole (1) 8" x 8" x 1/4" formed plate.

Total Hours, 6



Attn: Sheila
Evansville Marine Service
PO Box 6048
Evansville, IN 47719

Phone: 812-424-9278

Email: [REDACTED]

Invoice # 2-654576
11/15/2023
CUSTOMER#: BREC

Big River Electric Corp
710 West 2nd St
PO Box 20015
Owensboro, KY 42301

Equipment	Asset	Service	Fr/At-To	Start	Qty	Rate	Fuel	Water	Amount
AEP896	MV JAMES S	Repair	► EMS Green River Repair Cleaning Dock	08/08 00:00 08/09	-	2,780.01	---	0.00	2,780.01

Invoice Note:

Detail sheets are in Attached files.

Summary	
Total	2,780.01
Fuel Total:	0.00
High Water Total:	0.00

Total Amount Due: \$ 2,780.01

On the above date(s) we were the temporary custodian of your vessel(s) listed above. A courtesy routine visual inspection was performed pursuant to the owner/operators vessel general permit(s). Any non-conformities were relayed through other reporting and/or documentation means. Thank you for your business, Robert R. Aldrich.

Please Remit To: Evansville Marine Service, Inc. PO Box 6048 Evansville, IN 47719-0048

Vicky
Payne

Digitally signed by: Vicky Payne
DN: CN = Vicky Payne email =
Vicky.Payne@bigrivers.com C = US
O = Big Rivers Electric Corporation
OU = BREC
Date: 2023.11.16 08:03:42 -06'00'

**E. M. S. GREEN RIVER
10099 TILLMAN-BETHEL RD.
HENDERSON, KY 42420**

Barge Repair Sheet

Barge # **AEP-896**

Date

Start, 08-08-23

End, 08-09-23

Customer, **BREC,**

Comments

Labor, 18 Hours at 80.00 Per Hour,

1,440.00

Dry-Docking,

1,025.00

Tug service + Fuel escalator,

386.40

Competent Person, Metered for hot work,

150.00

Materials, Steel & Welding rods,

87.50

Price,

3,088.90

Total price at 10% Discount,

2,780.01

Evansville Marine Service, Inc.

VGP Barge Drydocking Inspection Report Form

Vessel General Permit Compliance

Instructions: This report is to be completed after barge drydocking. [REF: VGP 4.1.4 and VGP 4.2.3.]

Barge Owner: Big River Electric Barge Number: AEP-896

Shipyard Name: Evansville Marine Inspection Date: 8/8/23 Inspection Time: 12:00 P.M.

Custodian's Certification Statement

Items	Yes	No	N/A
Has the hull, chain locker and other surface areas been inspected for living organisms, and if found, were they removed and/or neutralized?	X		
Has the hull coating been applied, maintained and removed consistent with FIFRA label, and any exposed existing or any new coating applied contains only biocides and toxics approved for use in the U.S.?			X
Are cathodic protection, anodes or dialectic coatings cleaned and/or replaced?			X
Pertaining to questions above, describe any maintenance or repairs/comments: <u>See invoice for work performed</u>			
If wing tanks are free from water, do they contain any contaminants?		X	
If wing tanks have been pumped out, does surrounding water have an oily sheen?		X	
List any other violations discovered during this inspection: <u>None</u>			
Was a corrective action assessment performed for each violation?			X
Briefly discuss any corrective actions that were taken to address earlier violation: <u>N/A</u>			

Based upon the vessel's drydock inspection as noted in this document, I confirm this vessel has been inspected as indicated above and that the above statements are correct: Yes X No

Phillip Wilkerson
Name of Custodian or Designated Representative

Shipyard Foreman
Title

Phillip Wilkerson
Signature

8/8/23
Date

Submit completed form to Barge Owner.

Also, keep a copy on file at Custodian office.

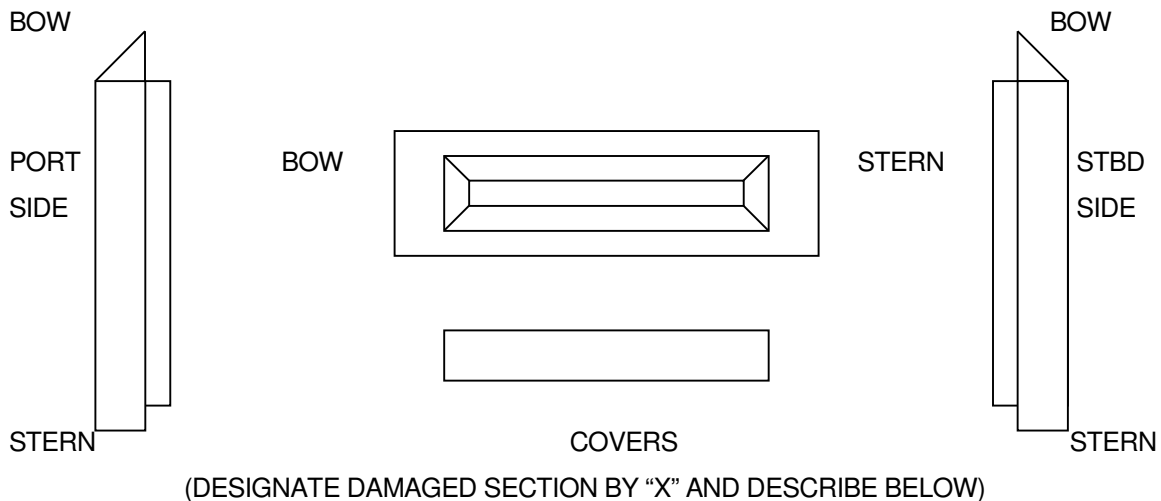
This document must be kept for a period not less than three years after the termination of coverage under the VGP.

EMS GREEN RIVER
10099 TILLMAN-BETHEL RD.
HENDERSON, KY 42420

Barge Condition and Damage Report

Barge Number: AEP - 896

Date, (Start, 08-08-23) (End, 08-09-23)



Description:

Dry-dock Repair,

#2, Wing tank starboard side-sheet at the four-foot draft we patched several cracks (1) 8" x 72" x 3/16" formed plate.

#3, Wing tank starboard side-sheet at the two-foot draft we patched one hole (1) 8" x 21" x 3/16" formed plate.

Dry-dock Labor,

(08-08-23) 3 Men 3 Hours = 9 Hours, (08-09-23) 3 Men 3 Hours = 9 Hours,

Total Hours, 18





**E. M. S. GREEN RIVER, TOPSIDE REPAIR,
10098 TILLMAN-BETHEL RD.
HENDERSON, KY 42420**

Barge Repair Sheet

Barge # **AEP-856**

Date

Start, 08-15-23

End, 08-15-23

Customer, **BREC,**

Comments

Labor, 4 Hours at 80.00 Per Hour,

320.00

Competent Person, Metered for hot work,

150.00

Materials, Steel & Welding rods,

9.80

Tug service + Fuel escalator,

386.40

Price,

866.20

Total price at 10% Discount,

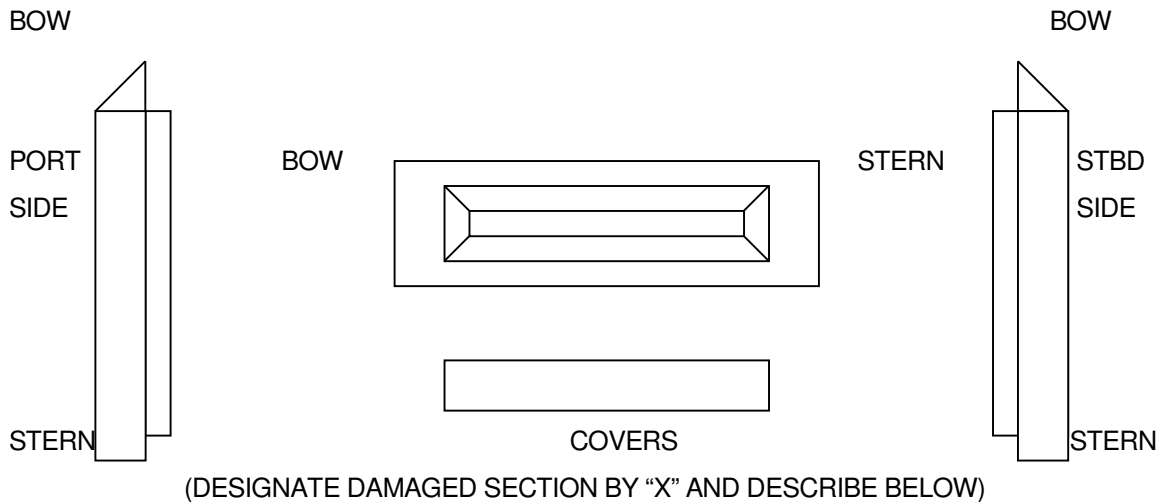
779.58

EMS, GREEN RIVER, TOPSIDE REPAIR,
10098 TILLMAN-BETHEL RD.
HENDERSON, KY 42420

Barge Condition and Damage Report

Barge Number: AEP – 856

Date, (Start, 08-15-23) (End, 08-15-23)



Topside Repair,

We repaired this barge in the camp fleet.

Hull,

Bow tank starboard side-sheet at the six-foot draft we welded one crack on lap seam totaling 12" times three passes and at the seven-foot draft we scarfed out and welded one crack totaling 12" times four passes.

Total Hours, 4

BIG RIVERS ELECTRIC CORPORATION
AN ELECTRONIC EXAMINATION OF THE
APPLICATION OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2023 THROUGH APRIL 30, 2024
CASE NO. 2025-00078

Responses to Commission Staff's Second Request for Information
dated July 3, 2025

July 18, 2025

1 Item 7) *Refer to BREC's FAC Form B filing for the expense month of*
2 *November 2023, pages 7 through 9 of 18. Provide a version in Excel*
3 *spreadsheet format, with all formulas, columns, and rows unprotected and*
4 *fully accessible. Any White-text tags that exist on the document but are*
5 *obscured by white text on the white background should be identified and the*
6 *purpose of those values should be clearly stated.*

7

8 **Response)** Please see the attached Excel spreadsheet.

9

10 **Witness)** Rebecca ("Becky") Shelton



In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT CLAUSE)	Case No.
OF BIG RIVERS ELECTRIC CORPORATION FROM)	2025-00078
NOVEMBER 1, 2023 THROUGH APRIL 30, 2024)	

Attachment to Response to PSC 2-7

Filed Separately in Excel Spreadsheet Format