COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2026 INTEGRATED RESOURCE PLAN OF BIG RIVERS ELECTRIC CORPORATION	)))))	**Case No. 2026-00268**

SIERRA CLUB'S TENDERED INITIAL REQUESTS FOR INFORMATION TO BIG RIVERS ELECTRIC CORPORATION

Sierra Club hereby submits this Tendered Initial Request for Information to Big Rivers Electric Corporation (referred to as "Big Rivers" or the "Company"). Please provide responses to these data requests below to the undersigned counsel.

GENERAL INSTRUCTIONS

1) **Definitions:** For the purposes of these data requests, the following definitions shall apply:

   a) The term "Big Rivers" means and includes Big Rivers Electric Corporation and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.

   b) The term "Companies" means and includes Big Rivers Electric Corporation and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.

   c) "Document" means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of

investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer's notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate "document."

d) "And" or "or" shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.

e) The terms "you" and "your" refer to "Big Rivers."

f) The term "person" means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.

g) The term "regarding" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

i) "Identify" or "identifying" or "identification" when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person's job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.

j) "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.

k) "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

(a) the type of document (e.g., letter, memorandum, etc.);

(b) the date of the document;

(c) the title or label of the document;

(d) the Bates stamp number or other identifier used to number the document for use in litigation;

(e) the identity of the originator;

(f) the identity of each person to whom it was sent;

(g) the identity of each person to whom a copy or copies were sent;

(h) a summary of the contents of the document;

(i) the name and last known address of each person who presently has possession, custody or control of the document; and,

(j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

l) "Identify" or "identifying" or "identification" when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.

m) "Current" when used in reference to time means in the present time of this data request.

n) "Customer" means a person or company (residential, commercial, or industrial) who buys retail electricity on a regular and ongoing basis from Big Rivers.

o) "Workpapers" are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

OTHER INSTRUCTIONS

a) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).

b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

(a) the privilege asserted and its basis;

(b) the nature of the information withheld; and,

(c) the subject matter of the document, except to the extent that you claim it is privileged.

c) For any document or set of documents Big Rivers objects to providing to Sierra Club on the grounds it is burdensome or voluminous, please identify the specific document (see instruction (k) above).

d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.

g) For each response, identify all persons (see instruction (j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.

h) Identify which witness(es) at the hearing is competent to adopt and/or discuss the response.

i) Please produce the requested documents in electronic format to the following individuals:

Joe Childers
joe@jchilderslaw.com

Nathaniel Shoaff
nathaniel.shoaff@sierraclub.org

j) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).

k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

l) Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

INITIAL DATA REQUESTS

1-1. Please provide supporting workpapers and modeling files, including (not limited to) all input files, output files, and pre- or post-processing of said inputs and outputs for all resource portfolios, scenarios, sensitivities, and years modeled, in machine-readable Excel format.

1-2. Please provide underlying data for the figures presented in the Big Rivers IRP Data Filing in machine-readable Excel format.

1-3. Please provide the Company's current load and accredited resources spreadsheet, under MISO accreditation methodology.

1-4. For each of the Company's fossil fuel-fired units, including Robert D. Green Station and D.B. Wilson Station, please provide the following historical data from 2021 through the latest date available in machine-readable Excel format. For 2021-2025 please provide annual data and for 2026, the year-to-date (latest data available). Where unit-level data is unavailable, please provide the plant-level data:

a) NOx emissions

b) Particulate matter (PM) emissions

c) SO2 emissions

d) CO2 emissions

e) Net generation (MWh)

f) Nameplate capacity (MW)

g) MISO accredited capacity (MW)

h) Non-environmental capital spending ($)

i) Environmental capital spending ($), including corresponding regulation

j) Variable O&M ($)

k) Fixed O&M ($)

l) Fuel cost ($) by fuel type

m) Fuel usage (MMBtu) by fuel type

n) Forced outage rate (%)

o) Planned outage rate (%)

p) Equivalent availability factor (%)

q) Heat rate (Btu/kWh)

r) MISO energy market revenue ($)

s) MISO capacity market revenue ($)

t) MISO ancillary services revenue ($)

u) Other revenues not included above ($)

1-5. For each of the Company's fossil fuel-fired units, including Robert D. Green Station and D.B. Wilson Station, and for each of the years 2026 through 2050 (or latest year available), please provide the most recent forecasts prepared by or for the Company in machine-readable Excel format. Where unit-level data is unavailable, please provide the plant-level data:

a) NOx emissions

b) Particulate matter (PM) emissions

c) SO2 emissions

d) CO2 emissions

e) Net generation (MWh)

f) Nameplate capacity (MW)

g) MISO accredited capacity (MW)

h) Non-environmental capital spending ($)

i) Environmental capital spending ($), including corresponding regulation

j) Variable O&M ($)

k) Fixed O&M ($)

l) Fuel cost ($) by fuel type

m) Fuel usage (MMBtu) by fuel type

n) Forced outage rate (%)

o) Planned outage rate (%)

p) Equivalent availability factor (%)

q) Heat rate (Btu/kWh)

r) MISO energy market revenue ($)

s) MISO capacity market revenue ($)

t) MISO ancillary services revenue ($)

u) Other revenues not included above ($)

1-6. For each of the Company's fossil fuel-fired units, including Robert D. Green Station and D.B. Wilson Station, please provide the following hourly information from 2021 through the latest date available in machine-readable Excel format. For 2021-2025 please provide data for the full year and for 2026, please provide the year-to-date (latest data available). (If not available at an hourly scale, explain why not and provide at the most temporally granular scale available.)

a) Price ($/MWh) of offers submitted into MISO Marketplace

b) Quantity (MW) of offers submitted into the MISO Marketplace

c) For each offer, whether that offer was accepted by MISO

d) Whether the hourly decision to dispatch a unit was made by the Company or MISO

e) Day-ahead dispatch status, such as market/economic, self/must run, outage, reliability, not participating or other recorded purposes

i. If there is an outage, please indicate whether it was planned or unplanned.

f) Real-time dispatch status, such as market/economic, self/must run, outage, reliability, not participating or other recorded purposes

i. If there is an outage, please indicate whether it was planned or unplanned.

g) Day-ahead unit commitment status, such as market/economic, self/must run, outage, reliability, not participating or other recorded purposes

i. If there is an outage, please indicate whether it was planned or unplanned.

h) Real-time unit commitment status, including market/economic, self/must run, outage, reliability, not participating or other recorded purposes

i. If there is an outage, please indicate whether it was planned or unplanned.

i) Accounting fuel costs ($/MWh) by fuel type

j) Marginal (variable) fuel costs ($/MWh) by fuel type

k) Start-up costs ($)

l) Accounting variable costs of production ($/MWh), including fuel, variable O&M, and any other variable operating costs

m) Marginal variable costs of production ($/MWh), including fuel, variable O&M, and any other variable operating costs

n) Net generation (MWh)

o) Locational marginal price received ($/MWh)

p) Energy market revenues ($)

q) Ancillary market revenues ($)

r) Congestion revenues ($)

s) Make whole/uplift payments from MISO ($)

t) Other revenues not included above ($)

u) Heat rate (Btu/kWh)

v) Economic minimum level (MW)

w) Economic maximum level (MW)

1-7. Please provide any RFPs issued for new supply-side resources in the past two years, including the bids received and any analyses of the bids done by or for the Company.

1-8. Refer to page 16 of the IRP which notes that Wilson "is the most economic unit." Please provide all information (with any data and calculations provided in machine-readable Excel format) that demonstrates the Company's assertion that Wilson is its most economic unit.

1-9. Refer to page 36-37 of the IRP which notes that: "Although interest from data center developers has increased dramatically, only five projects have advanced beyond the initial stages. One project progressed to an executed service agreement and recently received Commission approval; one has been publicly announced but has not entered into a service contract; and the remaining three confidential development prospects have not progressed beyond preliminary evaluation." Please also refer to Appendix A, "Historical and Projected Direct Serve Consumers, Use per Consumer, and Sales" which indicates that the Company currently has 16 direct serve customers, expects that number to increase to 18 in 2027, and remain at 18 for the remainder of the planning period.

a) Please confirm that the two direct serve customers the Company includes in its direct serve customer forecast are the project with a signed ESA

(Terawulf, 482 MW) and the project that recently received Commission approval (Paducah American Energy Hub, 1,800 MW). If not confirmed, please clarify.

b) Please provide the MWs (with customer names anonymized if necessary) associated with the other three data center projects (besides Terawulf and Paducah American Energy Hub) that "have advanced beyond the initial stages," as referenced on page 37 of the IRP.

c) Please confirm that the Company did not conduct any sensitivities related to its Direct Serve customer load forecast. If not confirmed, please clarify.

1-10. Please provide the avoided energy and capacity cost projections used in this IRP's DSM study and in the previous DSM study.

1-11. Refer to page 169 of the IRP which notes that "The active Wilson Phase 2 Landfill is monitored in accordance with the CCR Rule. It is presently in assessment monitoring with corrective action pending." Please provide detailed information regarding the pending corrective action, including anticipated costs and timing of all corrective actions.

1-12. Refer to page 193 of the IRP which notes that, under the Model Optimization approach, "retirements could not occur earlier than December 31, 2030, for Green and December 31, 2032, for Wilson," and that selecting these "staggered retirement thresholds" for Green and Wilson was "intended to provide sufficient time to develop and procure replacement resources, recognizing that the simultaneous retirement of both units would create a substantial capacity shortfall that would be challenging to replace all at once."

a) Please provide a detailed explanation of why the Company chose to limit the retirement optimization modeling such that Green would be the first eligible retirement (no earlier than the end of 2030) and Wilson would be the second (no earlier than the end of 2032).

b) Please confirm that the Company is claiming it would be unable to replace the capacity of Green and Wilson if their retirement dates were within two years of each other. If not confirmed, please clarify.

c) If confirmed, please provide all evidence to support the Company's assertion that it could not replace the capacity of Green and Wilson if their retirement dates were within two years of each other.

1-13. Refer to page 193 of the IRP which presents the Company's Fixed Retirement approach, which assumes Green retires by the end of 2039 and Wilson retires by the end of 2045. Please provide a detailed explanation regarding why those fixed

retirement dates were selected and provide all supporting evidence supporting those fixed retirement date decisions.

1-14. Refer to page 221-222 of the IRP which states that "initial modeling confirmed that Wilson would be needed through the planning horizon." Please provide a detailed explanation of what is meant by "initial modeling" as well as all initial modeling-related materials, including inputs and outputs, in machine-readable Excel format.

1-15. Refer to page 222 of the IRP which states that: "Within the capacity expansion model, Wilson is treated as a strategic decision point. The model may either retire the unit as early as December 31, 2032 (considering a timeline sufficient to satisfy Kentucky's law…), and replace its capacity with alternative resources by January 1, 2033, or elect to make the [redacted] investment and preserve the unit as a long-term dispatchable generating resource. Under scenarios that include fixed retirement of Wilson in 2045, the cost of the projects remains part of the portfolio because the investments help ensure reliable operation through the assumed retirement date. This approach allows the IRP to evaluate the tradeoffs between continued operation of an existing dispatchable asset and replacement with new resources under varying market, regulatory, and reliability conditions."

a) For the fixed retirement portfolio, when does the capacity expansion model assume the [redacted] investment in Wilson takes place? Please provide the year(s) and dollar amounts by year.

b) For the fixed retirement portfolio, if Wilson were assumed to retire before 2045, would any portion of the [redacted] in reliability investment costs be avoidable? If so:

   i. If the Company assumed a fixed Wilson retirement date in 2040: Please identify the dollar amount of avoidable reliability investment in Wilson.

   ii. If the Company assumed a fixed Wilson retirement date in 2035: Please identify the dollar amount of avoidable reliability investment in Wilson.

c) For the optimized retirement portfolio, when does the capacity expansion model assume the [redacted] investment in Wilson takes place? Please provide the year(s) and dollar amounts by year.

d) For the optimized retirement portfolio, is the model able to retire Wilson in years beyond 2032 without investing the full [redacted] in reliability upgrades?

e) Please also specify where, in Confidential Appendix D.1 Preferred Plan, "Wilson" tab, the [redacted] reliability investment is reflected.

1-16. Has the Company considered converting Wilson to operate on natural gas fuel? If so, please provide a detailed explanation of the Company's consideration process and all supporting information and materials. If not, please explain why not.

1-17. Refer to page 226 of the IRP which notes that the Company utilized "the U.S. Energy Information Administration's ("EIA") Annual Energy Outlook ("AEO") 2025 reference, high, and low natural gas price cases" in its long-term natural gas price forecast. Please provide a detailed explanation of why the Company elected to use EIA AEO 2025 instead of the more up-to-date EIA AEO 2026.

a) Please also provide the "basis adjustment" that the Company applied to the AEO 2025 Henry Hub forecasts to develop the corresponding Texas Gas Zone 1 price forecasts.

1-18. Refer to page 238 of the IRP which notes that "Utility-scale energy storage resources were evaluated as potential portfolio options within the IRP, including 4-hour standalone battery storage, 4-hour battery storage paired with solar generation, and 100-hour long-duration energy storage…Four-hour battery storage becomes available for selection beginning in 2031, with 100-hour storage available beginning in 2035."

a) Please confirm that only 4-hour and 100-hour battery storage duration options were considered. If not confirmed, please clarify.

b) If confirmed, please provide a detailed explanation regarding why battery storage durations between 4 and 100 hours were not considered as resource options in the Company's IRP.

1-19. Refer to page 249 of the IRP which notes that "To reflect practical development considerations, the IRP limits cumulative new solar and wind additions to a combined total of 800 MW over the planning horizon."

a) Please clarify whether cumulative additions were limited for any non-solar or wind resources in the Company's IRP modeling. If so, please provide limits by resource type and detailed explanations supporting each limit selection. If not, please provide a detailed explanation of why only solar and wind resources are subject to a cumulative resource addition limit.

b) Please provide a detailed explanation, including all supporting data, documentation, and information, supporting the Company's selection of 800 MW for the cumulative limit on solar and wind additions.

c) Please provide a detailed explanation supporting the Company's decision to establish a 800 MW cap on solar and wind resources combined as opposed to separate, wind- and solar-specific caps.

1-20. Refer to Confidential Appendix D.1 Preferred Plan, "Capacity Position" tab at row 22 in the Winter season "Resource Firm Capacity (MW) – Existing" table. Please confirm that the values in row 22 are correct. [redacted] If not confirmed, please provide a corrected workbook.

1-21. Refer to Confidential Appendix D.1 Preferred Plan, "Capacity Position" and "Energy Position" tabs. Please clarify whether the Company includes any energy efficiency resources in its preferred plan. If so, please provide energy efficiency capacity/energy by year for the forecast period as distinct and separate from "Demand Response," "Industrial DSM" and "Residential DSM" resource lines.

1-22. Regarding the Company's modeling of—and intention to pursue as part of its short-term action plan—the Green Fuel Oil Backup Project:

a) Did the Company's IRP include a fuel oil price forecast sensitivity?

b) Please provide all the sources that were utilized to develop the Company's fuel oil price forecast as presented in Confidential Appendix D.2 Modeling Assumptions.

c) Please provide a detailed explanation of how the Company's fuel oil price forecast was constructed.

Dated: November 12, 2026

Respectfully submitted,

/s/ Joe F. Childers
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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Tendered Initial Requests for Information to Big Rivers Electric Corporation in this action is being electronically transmitted to the Commission on November 12, 2026, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers

JOE F. CHILDERS