COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2026 INTEGRATED	)	
RESOURCE PLAN OF BIG RIVERS	)	CASE NO. 2026-00268
ELECTRIC CORPORATION	)	

ATTORNEY GENERAL'S FIRST REQUEST FOR INFORMATION TO BIG RIVERS ELECTRIC CORPORATION

Comes now the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention ("Attorney General"), and submits these Data Requests to Big Rivers Electric Corporation., (hereinafter "Big Rivers," "BREC", or "The Company") to be answered by the date specified in the Commission's October 16, 2026 Orders of Procedure in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.

(2) Identify the witness who will be prepared to answer questions concerning each request.

(3) Repeat the question to which each response is intended to refer.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or

private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify undersigned Counsel as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words ''document'' or ''documents'' are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and

caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) "Each and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on November 13, 2026 an electronic copy of the foregoing was served via the Commission's electronic filing system.

This 13th day of November 2026.



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Assistant Attorney General

1. Refer to the 2026 Integrated Resource Plan ("IRP"), Section 1.2.2, RTO Membership/Bilateral Contracts, pages 15-16.
   a. Provide the net savings or benefits BREC has realized from its MISO membership through the most recent data available, and explain in detail how these savings or benefits were calculated.
   b. Explain in detail the beneficial operational changes that have results from BREC's participation in the MSO day-ahead and real-time energy and capacity markets.
   c. Provide all the costs of BREC's MISO membership that are paid by its member-owners, including administrative, transmission, and ancillary-service charges.
   d. Explain whether BREC has revaluated, or will evaluate, whether continued membership in MISO remains in the best interest of its member-owners, and provide any such cost-benefit analysis.
   e. Provide the current status of each of BREC's bilateral power sales agreements, including the contract(s) with entities in the State of Nebraska, the agreement with Owensboro Municipal Utilities, and the agreement with the Kentucky Municipal Energy Agency ("KYMEA").
   f. For each agreement, provide the contracted capacity (MW), the expiration date, and the status of any renewal or extension.
   g. Explain how the expiration, renewal, or non-renewal of each agreement affects BREC's capacity position and the rates charged to Member-Owners.
2. Refer to the 2026 IRP, Section 1.2.2, RTO Membership / Bilateral Contracts, pages 15-16, which contains discussion of BREC's participation in the MISO day-ahead and real-time energy markets and its use of bilateral contracts.

a. Explain how frequently BREC relies on MISO market purchases to serve its native load, and provide the share of BREC's native energy requirements met through market purchases in each of the last five years.

b. Explain the circumstances and reasons that lead BREC to purchase energy from the market rather than dispatch its own generation, including economics, unit outages, winter natural gas constraints, and reserve shortfalls.

c. Describe the price and reliability risks to Member-Owners associated with reliance on market purchases, particularly during MISO's highest-risk hours.

3. Refer to the 2026 IRP, Section 1.2.8, Economic Development, pages 37-39, which contains discussion of large-load and data center development (Section 1.2.8) , including the Retail Electric Service Agreement ("RESA") with TeraWulf Inc. approved in Case No. 2026-00115.

a. Explain whether BREC expects the TeraWulf agreement, or any other prospective data center or large-load agreement, to reduce the rates paid by existing Member-Owner ratepayers.

b. If a rate reduction is expected, quantify the expected benefit and explain the mechanism that produces it (e.g., demand adders, customer charges, or contributions to BREC's fixed costs), and provide any supporting analysis.

c. If no rate reduction is expected, explain whether and how such agreements are nonetheless expected to affect existing ratepayers' rates over the planning horizon.

d. Provide the expected date on which the TeraWulf data center will come online and begin taking service at its Maximum Contract Demand, including the Construction Completion Date and any ramp schedule under the RESA.

e. For each other prospective data center or large-load project BREC is tracking, provide the expected timeline from agreement execution to energization.

4. Refer to the 2026 IRP, Section 2.3.1, Overview of the Regulatory Climate page 54. BREC states that its IRP focus is "maintaining system reliability, compliance, and cost-effectiveness in a dynamic regulatory environment."

   a. Discuss in detail how BREC intends to maintain high reliability of electric service to its owner-members.

   b. Explain detail how BREC intends to economically diversify the following:

      i. Market Purchases.

      ii. Fossil Fuels,

      iii. Renewables,

      iv. Demand Management,

      v. Energy Efficiency Programs, and

      vi. Partnering Opporunties.

5. Refer to the 2026 IRP, Section 1.2.3, page 20. BREC states that it "places emphasis on efficiency, so the Company continues to make strides in generation efficiency improvements to maximize asset value."

   a. Identify and describe each generation efficiency improvement project, initiative, or operational change implemented by BREC during the past five years. For each, provide the date of implementation, the generating unit affected, the costs incurred, and the anticipated and actual efficiency improvements.

   b. For each efficiency improvement initiative identified in response to subpart (a), quantify the actual improvement in heat rate, fuel consumption, generation costs, or

other relevant performance measures attributable to the initiative. If BREC has not quantified the actual benefits, explain why not.

c. Explain how BREC measures and evaluates the efficiency of its generating units. Identify all performance indicators used, including heat rate, boiler efficiency, auxiliary power consumption, and any other relevant measures. Provide the Company's efficiency targets or benchmarks, if any.

d. BREC states that it offers its generating resources into the MISO market at the lowest generation levels consistent with reliable operations, even though operating at lower minimum generation levels may negatively affect heat rate during those hours. Explain how BREC evaluates the tradeoff between heat rate efficiency, fuel costs, market revenues, and the reduction in unit starts and shutdowns when determining the appropriate operating levels for each generating unit.

e. Identify any additional generation efficiency improvements that BREC has evaluated but elected not to pursue during the past five years. For each, explain the reasons the Company decided not to proceed, including any economic, operational, or reliability considerations.

6. Refer to Section 1.28. of the 2026 IRP, page 36 and Table 1.2.8(a). BREC has states that it has received a number of requests for information ("RFIs") from prospective customers.

a. Identify each prospective data-center or other large-load development project in BREC's service territory that has been evaluated or considered since January 1, 2024. For each customer, please provide the requested electric demand in MW and anticipated annual energy requirements in MWh.

b. For or each perspective data-center or other large-load development, pleas provide the project's current development status, including whether it remains at the request-for-information stage, has advanced to site evaluation or engineering studies, has entered into contract negotiations, or has executed a service agreement

c. Explain how BREC evaluates the likelihood that a prospective large-load project or direct serve customer will proceed to commercial operation. Identify the criteria used to distinguish speculative inquiries from credible development opportunities and explain how those criteria affect the Company's resource planning and load forecasting.

7. Refer to the 2026 IRP, Section 1.2.9, Planning Goals and Objectives, page 40, in which BREC states that the IRP "outlines how the Company will continue providing reliable, affordable, and lower risk electric service to its members" and "model[s] Big Rivers' current supply and demand portfolio, evaluating the potential retirement of the existing coal-fired and natural gas-fired resources while exploring new resource options to meet member needs."

a. Identify and explain the current legal, regulatory, and industry pressures that BREC contends could require the favor the retirement of its existing coal-fired and natural gas-fired resources.

b. Explain in detail whether BREC believes it can have an affordable and reliable electric grid if it was ever forced to close its coal and natural gas plants.

c. Explain in detail whether BREC believes it can have an affordable and reliable electric grid if required to rely upon renewable energy.

8. Refer to the 2026 IRP, Section 2.3.2 Federal and Regional Regulatory Framework, pages 56-58, which provides discussion of FERC Order No. 1920 and the requirement that MISO

conduct long-term, scenario-based regional transmission planning built around projected fossil-fuel retirements and expected clean-generation growth.

a. Explain whether the long-term transmission planning scenarios MISO is developing under Order No. 1920 assume the retirement of BREC's coal-fired Wilson Station or any other Big Rivers dispatchable unit, and if so, on what assumed retirement dates.

b. Explain whether BREC believes those scenario assumptions are consistent with its own preferred portfolio, which retains Wilson and the Green units, and with the rebuttable presumption against retirement of dispatchable resources under KRS 278.264.

c. Describe the transmission cost-allocation exposure to BREC's Member-Owners under Order No. 1920 for long-term projects driven by renewable-generation interconnection and clean-generation growth elsewhere in the MISO footprint, and quantify that exposure to the extent known.

d. Explain what positions BREC has taken, or intends to take, in the MISO Long-Range Transmission Planning and Order No. 1920 stakeholder processes to (i) ensure the planning scenarios reflect continued operation of its dispatchable coal and gas fleet and (ii) protect its Member-Owners from being allocated the costs of transmission built to serve generation retirements and renewable additions that may not be endorsed.

9. Refer to the 2026 IRP, Section 2.3.3 State Regulatory Considerations, pages 58-59, which states that KRS 278.264 establishes a rebuttable presumption against the retirement of fossil fuel-fired generation and that KRS 164.2807 reflects a legislative policy favoring the preservation and continued operation of existing generation resources that support reliability and affordability.

a. Confirm that BREC interprets KRS 278.264 and KRS 164.2807 as reflecting a Kentucky policy preference for preserving and continuing to operate existing dispatchable fossil fuel-fired generation, including the coal-fired Wilson Station and the natural gas-fired Green Units. If not confirmed, explain in detail.

b. Explain specifically how this statutory framework shaped the IRP's modeling assumptions and the range of resource portfolios considered, including how it inform the decision to retain Wilson and the Green Units in the preferred portfolio.

10. Refer to the 2026 IRP, Section 2.3.4 Planning Under Regulatory Uncertainty. Provide a detailed list of how all of President Trump's Executive Orders are/will affect BREC, including but not limited to the following: January 20, 2025 Executive Order Unleashing American Energy[1], February 14, 2025 Executive Order Establishing the National Energy Dominance Council[2], April 8, 2025 Executive Order Reinvigorating America's Beautiful Clean Coal Industry and Amending Executive Order 14241[3] April 8, 2025 Executive Order Protecting American Energy from State Overreach, and the April 8, 2025 Executive Order Strengthening the Reliability[4], and Security of the United States Electric Grid.[5]

11. Refer to 2026 IRP, Section 2.4 Significant Changes – MISO, which describes MISO's seasonal resource adequacy construct, the shift of reliability risk away from the summer peak toward winter morning and evening periods and summer solar ramp-downs, and the transition to Direct Loss of Load (DLOL) accreditation beginning with the 2028/2029 Planning Year.

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[1] https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/.
[2] https://www.whitehouse.gov/presidential-actions/2025/02/establishing-the-national-energy-dominance-council/
[3] https://www.whitehouse.gov/presidential-actions/2025/04/reinvigorating-americas-beautiful-clean-coal-industry-and-amending-executive-order-14241/
[4] https://www.whitehouse.gov/presidential-actions/2025/04/protecting-american-energy-from-state-overreach/
[5] https://www.whitehouse.gov/presidential-actions/2025/04/strengthening-the-reliability-and-security-of-the-united-states-electric-grid/

a. Confirm that, under MISO's Seasonal Accredited Capacity and DLOL frameworks — which weight availability during high-risk (Tier 2) hours at 80% — BREC's dispatchable units (Wilson and the Green Units) receive higher seasonal capacity accreditation relative to nameplate than the Company's intermittent solar resources. If not confirmed, explain in detail and provide the seasonal accreditation values for each resource.

b. Explain how the migration of MISO's reliability-risk hours into winter periods and solar ramp-down hours affects the relative capacity value of fuel-secure, dispatchable generation versus intermittent resources, and whether the trend supports retaining the Wilson and Green units.

c. Explain how the DLOL transition is expected to change the accreditation of each of BREC's resources and the Company's overall capacity position, and whether BREC could face a seasonal capacity shortfall, particularly in winter, in the event any dispatchable unit were retired before DLOL values are finalized.

d. Explain whether, under the seasonal construct, BREC expects to rely on MISO capacity-market purchases to meet any seasonal Planning Reserve Margin Requirement, and the cost and reliability risks to Member-Owners of depending on market purchases rather than owned dispatchable capacity during MISO's highest-risk hours.

12. Refer to the 2026 IRP, Section 2.5 Market Trend Summary, pages 69-70.

a. Confirm that the solar resources in BREC's portfolio and the broader growth of solar in MISO do not provide meaningful firm capacity during winter cold-weather peak conditions. If not confirmed, explain in detail.

b. Explain how the limited winter capacity contribution of solar supports retaining BREC's' dispatchable, fuel-secure generation to meet cold-weather peaks.

13. Refer to the 2026 IRP, Section 1.27 Big Rivers' Member Load and Load Growth, page 35, Chapter 3 Load Forecast and Appendix A, which projective native energy and peak demand to grow at an average annual rates of approximately 0.89% and .41%, respectively, from 2025 through 2044.

a. Discuss the various factors driving the projected growth in native energy and peak demand, including the relative contribution of each factor identified in the forecast (e.g., employment, number of households, gross regional product, electric-vehicle stock, distributed solar, and the real price of retail electricity).

b. Explain how BREC intends to meet the forecasted growth in native energy and peak demand, and whether that growth, standing alone, is sufficient to require any new resource beyond the existing dispatchable fleet.

c. Provide the base, high, and low load forecasts for each year of the planning horizon, and identify the principal assumptions that distinguish the high and low cases from the base case.

14. Refer to the 2026 IRP Chapter 3 Load Forecast, and the load forecast prepared by Clearspring Energy Advisors.

a. Provide the historical (last five to ten years) and forecasted annual energy sales and coincident peak demand by customer class — rural and Direct Serve — in tabular form.

b. Describe the econometric methodology used to develop the forecast, including the electricity-price elasticity assumptions applied to each class and, if available, the dollar impact associated with those elasticity assumptions.

c. Explain whether, and how, the load forecast reflects the TeraWulf data center load, the two additional Direct Serve smelter-load consumers identified in Kenergy's forecast, and any other large-load or economic-development projects, and identify every load that is excluded from the native forecast used in the capacity-expansion modeling.

15. Refer to the 2026 IRP, Chapter 4, Demand-Side Management.

a. Provide a detailed list of each DSM and energy-efficiency program BREC proposes to implement over the planning period, with a description and projected cost of each.

b. Explain whether any proposed DSM programs were found to not be cost-effective under the Total Resource Cost test. If any programs were found not to be cost-effective, explain why.

c. In the 2023 IRP, BREC's potential study identified cost-effective DSM but BREC did not plan to implement new DSM programs, and Commission Staff found the plan gave insufficient consideration to DSM. Explain what has changed in the 2026 IRP, and identify which programs BREC now commits to implement versus those it treats only as "achievable potential."

d. Provide BREC's total DSM budget (present value) over the planning period, broken down by program and by year, and identify the funding-level scenario from § 4.5.1 that BREC adopted in the preferred portfolio.

16. Refer to the 2026 IRP, Section 4.2 Methodology, pages 91-107, and Section 4.5 Energy Efficiency Program Potential, pages 122-128.

a. Identify the cost-effectiveness test(s) used to screen DSM measures and programs (e.g., the Total Resource Cost test) and provide the benefit-cost ratio for the overall portfolio and for each program.

b. Identify any measure or program included despite not passing the applied cost-effectiveness test, and explain why it is being offered.

c. Provide the avoided energy and capacity cost assumptions and the discount rate used in the analysis, and explain how each was derived.

d. Explain how the three energy-efficiency program potential (funding-level) scenarios described in Section 4.5.1 page 128, were defined, and identify which scenario BREC adopted in the preferred portfolio.

17. Refer to the 2026 IRP, Section 4.1.4 Summary of Demand Response Potential, page 90, Section 4.6 Demand Response Methodology page 132-133, Section 4.6.4 Avoided Costs, page 138, Section 4.6.5 Demand Response Program Assumptions, page 138, and Section 4.6.6 Demand Response Program Potential Scenarios pages 145-149.

a. Describe each demand-response program evaluated in Section 4.6.2 (Demand Response Program Options), page 133, and the pilot DR programs in the short-term action plan, with the projected peak-demand reduction (MW) and cost of each.

b. Explain whether BREC's DSM and energy-efficiency cost-effectiveness results rely on federal tax credits, including credits under the Inflation Reduction Act, and how repeal or phase-out would change the achievable potential and the programs BREC implements.

c. Explain how the achievable demand-response and energy-efficiency potential translates into the approximately 17 MW of winter peak-demand reduction reflected

in the Reference Case action plan, and whether cost-effective potential beyond that amount was identified in Section 4.7 (Demand Response Potential), page 146, but not captured in the preferred portfolio.

d. Provide the status, scope, and expected cost of the DERMS development plan described in Section 4.8 (DERMS Development Plan), page 149.

18. With regard to any anticipated renewable energy projects, provide the proposed accounting treatment for all renewable energy credits (RECs).

19. Refer to the 2026 IRP, Section 6.5.8 Scorecard Evaluation, page 197, which states that the IRP Scorecard compares alternative resource portfolios across "affordability, reliability, risk and opportunity, and sustainability objectives" and is designed to evaluate the "cost, reliability, risk, and environmental tradeoffs" of alternative resource strategies.

a. Explain what BREC means by the "sustainability" objective in the IRP Scorecard and how that objective is measured.

b. Explain whether the sustainability objective reflects a goal of reducing carbon emissions or otherwise decarbonizing BREC's generating fleet, and if so, identify the emission reduction targets or metrics used.

c. Identify the specific entities, mandates, or market pressures, if any, that are prompting BREC to pursue the decarbonization or the reduction of emissions.

d. Explain whether BREC would pursue any decarbonization or emissions-reduction measure that is not required by federal or state law, and if so, explain the basis for doing so.

e. Explain how BREC weighs the sustainability objective against the affordability and reliability objectives when they conflict, and confirm that affordability and reliability to Member-Owners take precedence. If not confirmed, explain in detail.

f. Quantify any increase in cost to Member-Owners attributable to pursuing the sustainability objective rather than a least-cost, reliability-focused portfolio.

20. Refer to the 2026 IRP, Section 6.85 Caron Tax, pages 231 and 232.

a. Explain how BREC intends to respond to growing pressures to decarbonize.

b. Explain in detail how BREC plans to ensure reliability and affordability of electric service it intends on supporting electrification and decarbonizing.

c. Explain whether BREC intends to continue to decarbonize even if the federal and state law does not require it to decarbonize. If so, explain the answer in detail.

d. With electric bills and unaffordability for customers at all-time highs, explain in detail wither BREC believes it is an acceptable cost to the public to decarbonize.

21. Refer to the 2026 IRP, Section 9.1 Action Plan Detail, pages 303-304.

a. Explain how BREC hedges its energy and capacity price exposure across all four MISO seasons, including its use of market purchases and bilateral contracts.

b. Explain the winter reliability problem that Green Fuel Oil Backup Project is intended to address, including the extent to which the Green Units' winter capacity is otherwise reduced by natural gas supply constraints during periods of high winter gas demand, and confirm that the project adds approximately 144 MW of winter capacity accreditation.

c. Explain the importance of having the coal-fired Wilson Station available to serve load during extreme inter conditions when natural gas supplies to generators may be curtailed.

d. Confirm that, among BREC's existing and planned resources, only the dispatchable thermal units (Wilson and the Green Units) are capable of providing continuous, firm capacity, while the Unbridled Solar facility and any planned solar additions are not. If not confirmed, explain in detail.

e. Explain whether the Unbridled Solar facility or any planned solar addition includes battery storage, and if not, explain whether battery storage was evaluated and whether it is cost-prohibitive.

f. Explain whether BREC has sufficient accredited capacity to meet its summer and winter coincident peak obligations in each year of the planning horizon, and, to the extent winter capacity is shorter, how BREC intends to cover that need (e.g., through market purchases or power purchase agreements).

22. Explain the basis for BREC's determination that retirement of the 65 MW Reid Combustion Turbine ("Reid CT") without construction or acquisition of a dedicated replacement generating resource will not adversely affect the Company's ability to provide adequate and reliable electric service.

23. Identify each resource, investment, or other measure upon which BREC relies to support its determination that replacement generation is unnecessary. For each measure, quantify its expected contribution to seasonal accredited capacity and explain how that contribution offsets the loss of Reid CT.

24. Explain how the loss of Reid CT's historical energy contribution has been incorporated into the IRP's production-cost modeling and projected annual energy position. Identify the extent to which the lost generation is expected to be replaced through increased generation from existing resources or purchases from the MISO market, and provide the associated projected costs.
25. Explain how BREC accounted for prospective data center and other large-load development in the load forecast underlying the 2026 IRP. Identify the amount of prospective large-load demand, if any, included in the forecast, the projects or categories of projects reflected, and the year in which each was assumed to begin taking service. If no prospective data-center or other large-load demand was included, explain the basis for that determination.
26. Provide the project non-native sales forecast for the three-year IRP period.
27. Indicate whether BREC has analyzed and explored adding a nuclear plant to the Company's generating fleet.

    a. If not, explain why BREC has not analyzed such an addition.
    b. If so, explain if BREC plans to pursue this option, and if BREC has considered any joint ownership/partnership agreements to finance the construction of this resource. Please provide the documents and materials utilized in making this analysis.

28. Explain whether BREC anticipates that serving prospective large-load customers will require additional generation resources, long-term power purchase agreements, market purchases, demand-response resources, or other supply arrangements. For each anticipated resource or arrangement, identify the expected timing, capacity or energy contribution,

estimated cost, and allocation of costs and risks between the prospective customer and existing members.

29. Given the rising reliability challenges facing the Commonwealth of Kentucky, explain whether BREC has evaluated whether the benefits of a direct transmission interconnection with East Kentucky Power Cooperative, Inc. ("EKPC") would outweigh its costs. The Attorney General understands that the two utilities' transmission systems come within a few miles of one another, and that EKPC and Louisville Gas and Electric Company / Kentucky Utilities Company maintain more than seventy interconnections. Because EKPC is interconnected with PJM and operates an extensive transmission system, a direct Big Rivers–EKPC interconnection would appear to link the Commonwealth's regulated electric generating utilities, enhance statewide reliability, and offer a more robust physical hedge against reliability risks of all types. Such an interconnection might also position Big Rivers to join PJM at some future point and create additional interconnection capability between TVA and PJM.

30. Confirm that all generation resources at Sebree station are gas-fired.

    a. If so confirmed, identify the gas pipeline providing supply to Sebree station.

    b. Explain whether Big Rivers has ever considered dual-fuel capability at Sebree station. If so, provide copies of all relevant studies and analyses that may have been conducted in this regard.

    c. For the existing gas-fired unit, have you considered negotiating any termed supply contracts, or guaranteed delivery contracts, with the pipeline owner that might provide a beneficial hedge against potential increased fuel costs or lack of pipeline capacity?

31. Has BREC analyzed whether adding additional generating resources to its fleet, agnostic of fuel/power source, would be the most effective and forward-thinking resource plan to ensure BREC is able to supply reliable, sustain, and affordable power?
32. Provide the net annual capacity factor for Wilson and for each Green Unit for each of the past ten years.
33. Refer to the 2026 IRP, Section 6.7.1 Existing Resources, page 205,
    a. Provide the variable cost of dispatching each Green Unit — including fuel, variable operation and maintenance, and start-up costs — expressed in dollars per MWh, for the most recent twelve-month period available
    b. Explain how each Green Unit's dispatch cost compares to the Wilson Station's dispatch cost and to prevailing MISO market energy prices, and how that comparison affects how frequently each Green Unit is dispatched.
    c. Explain the effect of the Green Fuel Oil Backup Project on the Green Units' dispatch cost when the units operate on fuel oil rather than natural gas.
34. Identify and rank the largest drivers of the cost of the electricity BREC sells to its Member-Owners (e.g., fuel, purchased power and capacity, transmission, MISO administrative and ancillary charges, environmental compliance, debt service, and capital investment).
    a. For each driver, explain how it is expected to change over the planning horizon and the anticipated effect on Member-Owner rates.