

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC) CASE NO.
CORPORATION FOR AN ADJUSTMENT OF RATES) 2012-00535

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation ("Big Rivers"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due not later than March 28, 2013. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the 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.

Big Rivers shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Big Rivers fails or refuses to furnish all or part of the requested information, it shall

provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to Big Rivers' response to Item 4 of Commission Staff's Second Information Request ("Staff's Second Request"), which includes its base period showing the actual results of operations through January 2013. Provide an update of the base period with actual results through February 2013. Consider this an ongoing request to which updates with actual results for the final two months of the base period should be provided by the end of the following calendar month.

2. Refer to the attachment to Big Rivers' response to Item 9 of Staff's Second Request. Provide the average \$/MWh price Big Rivers has realized on off-system sales during January and February of 2013.

3. Refer to the attachment to Big Rivers' response to Item 17 of Staff's Second Request, which provides a comparison of amounts budgeted for construction projects and the actual costs of construction projects for the years 2010, 2011, and 2012. Provide, in the same format as in the attachment, a breakdown of these budgeted and actual amounts between environmental and non-environmental projects.

4. Refer to Big Rivers' response to Item 18 of Staff's Second Request, page 8 of 10, which refers to several potential customers Big Rivers may have an interest in

servicing and includes the size of the load of one such customer. Provide the size of the loads of the four largest potential customers other than the one already identified.

5. Refer to the Requests for Proposals ("RFP") attached to the response to Item 18 of Staff's Second Request. On page 26 of 28 of the response, the RFP of Louisville Gas and Electric Company and Kentucky Utilities Company ("LG&E/KU") indicates the evaluation was to be completed by March 15, 2013. State whether Big Rivers has received notice of whether it is continuing to be considered by LG&E/KU.

6. Refer to Big Rivers' response to Item 21 of Staff's Second Request, page 4 of 7. Lines 11-12 indicate that Big Rivers anticipated receiving results from the Midwest Independent System Operator ("Midwest ISO") to the Attachment Y-2 request it submitted on December 19, 2012, "in early to mid-March." If they have been received, provide the Midwest ISO results along with a narrative description thereof. If they have not been received, state when Big Rivers expects to receive the results.

7. Refer to Big Rivers' response to Item 36 of Staff's Second Request. Exhibit Wolfram-5.2 in the response is a three-page exhibit while Exhibit Wolfram-5 in the application is a four-page exhibit. Provide the fourth page of Exhibit Wolfram-5.2.

8. Refer to Big Rivers' response to Item 24.c. of Kentucky Industrial Utility Customers, Inc.'s ("KIUC") First Information Request ("KIUC's First Request"), page 12 of the Direct Testimony of Travis A. Siewart and Exhibit Siewart-3. Identify what amount, if any, of interest costs on the financing for the \$60 million in pollution-control equipment Big Rivers plans to install in 2013 and 2014 is included in the \$46,983,291 in interest on long-term debt in the proposed test period.

9. Refer to page 2 of 18 of the attachment to Big Rivers' response to Item 25.a. of KIUC's First Request. If it has been finalized and submitted to the Rural Utilities Service ("RUS"), provide the corrective plan mentioned in the last sentence of the letter from Billie J. Richert to the RUS Administrator.

10. Refer to Big Rivers' response to Item 36.c. of KIUC's First Request. Provide Big Rivers' estimate of the annual reduction in variable operating costs it would realize if it were to idle the Coleman Generating Station.

11. Refer to Big Rivers' response to Item 53.c. of KIUC's First Request. Confirm that the requirement for interest income on the Transition Reserve to be adjusted out of the contract Times Interest Earned Ratio calculation is a requirement of Section 4.7.5(f) of the Smelter Agreements and no other agreement or document.

12. Refer to the response to Item 7 of Alcan Primary Products Corporation's First Request for Information. Provide a general description of how, upon completion of the "TVA Paradise" switchyard upgrade project, Big Rivers will be able to export all the smelter power. Include in the description, at minimum, the specific interconnects over which the power could be transferred, the export of each interconnect, and the specific utilities to which the power could be transmitted.

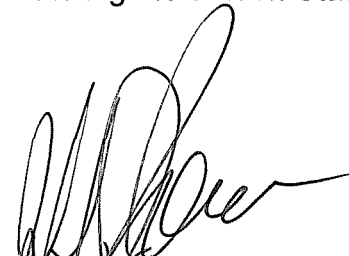
13. Refer to Big Rivers' response to Item 58 of the Attorney General's ("AG") First Request for Information ("AG's First Request"), page 3 of 3. Provide the smelter rates in July of 2009, at the time of the Unwind Transaction, and in August 2012, at the time of Century Aluminum's termination notice expressed in dollars per megawatt-hour.

14. Refer to Big Rivers' response to Item 89 of the AG's First Request, page 24 of 24. In comparing projected retail rural rates of its members with retail rural rates

of other utilities, state whether the "rural" rates of the other utilities reflect those utilities' retail residential rates. If not residential rates, identify what rates are reflected.

15. Refer to the attachment to Big Rivers' response to Item 104 of the AG's First Request. Of the non-environmental production construction projects budgeted for 2013 and 2014, provide the total dollar amount the projects Big Rivers expects will be completed by the end of the test year in this proceeding.

16. Refer to Big River's response to Item 107.e. of the AG's First Request. Provide a breakdown, by year and by cost category, of the estimate of approximately \$72.6 million in fixed costs savings to its members of idling the Wilson Station during the 2014-2016 timeframe.



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DATED MAR 14 2013

cc: Parties of Record

Case No. 2012-00535

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