

201 Third Street P.O. Box 24 Henderson, KY 42419-0024 270-B27-2561 www.bigrivers.com

January 28, 2014

RECEIVED

JAN 3 0 2014

PUBLIC SERVICE COMMISSION

Mr. Jeff DeRouen **Executive Director** Public Service Commission 211 Sower Blvd. P. O. Box 615 Frankfort, Kentucky 40602-0615

Re: Case No. 2012-00535 - Letter Dated January 27, 2014 - Refund Calculations

Dear Mr. DeRouen:

Please refer to your letter to me of January 27, 2014, in which you explain Commission Staff's belief that Big Rivers Electric Corporation ("Big Rivers") may have made an error in its calculation of the refund amount owed to its member cooperatives in Case No. 2012-00535. The specific question raised is whether Big Rivers' calculations took into account that August 2013 was a partial month for purposes of the refund calculations.

We have reviewed Big Rivers' filing of January 13, 2014 (the "Refund Filing"), and believe the calculations in it are correct, although we concede that tracking the calculations through the exhibits in the Refund Filing is confusing. The difference between the Commission Staff's calculations and Big Rivers' calculations is the assumption by Commission Staff that Big Rivers calculated the energy charge variance in August 2013 based upon each member's energy usage during the calendar month of August 2013, rather than their energy usage only during the period from August 20 through August 31, 2013 (the "Partial Month"). In fact, Big Rivers did use real time energy usage meter readings for the Partial Month to calculate the energy charge variance.

Using Jackson Purchase Energy Corp. ("JPEC") as an example, JPEC's metered kWh usage during the Partial Month based upon real time meter readings is accurately shown as 26,822,923 in the Refund Filing, Exhibit 2, at page 1 of 15, on the "JACKSON PURCHASE RURALS" line, in the "Aug kWh*" column. The asterisk in the column title is intended to reference a footnote on page 6 of 15 of Exhibit 2 that states that this amount represents a partial month's usage. By comparison, JPEC's total Rural class kWh usage for August of 2013 was 61,508,892.

The attached exhibit, "Refund - Detail Exhibit 2," summarizes Big Rivers' calculation of the rate variance refunds to Big Rivers' members that are detailed in the Refund Filing. The column titled "Rate Variance*" on Page 4 of 15 reflects the rate variance based upon real time, metered kilowatt hour usage for the Partial Month.

Again using JPEC as an example, the calculations for the total rate variance refund for JPEC for August are as follows:

Refund_related_to_Demand:

Column C: August kW (for the entire month) = 137,192 Column D: Demand rate variance (\$16.95 - \$12.914 = \$4.036) = \$553,706.91

= \$214,338.16 (Demand Refund) Column E: 12/31 days in August Rate Variance (Refund)

Mr. Jeff DeRouen January 28, 2014 Page Two

Refund Offset related to Energy:

Column F: August 20 – 31, 2013 Actual kWh: 26,822,923

Energy Rate variance – an increase (.03 - .035 = -0.0050)

Column G: Rate Variance (Refund Offset) for 12/31 days In August: = (\$134,114.62) (Energy Refund

Offset)

The sum of the Energy Refund Offset amounts for the Partial Month for JPEC's Rural class (\$134,114.62), Kenergy Corp.'s Rural class (\$241,137.54) and Meade County RECC's Rural class (\$87,020.90) Is \$(462,273.06), which is reflected in the "Rate Variance" column on the Refund Filing Exhibit 2, Page 4 of 15.

We hope this explanation addresses the Commission's questions regarding the calculation of these amounts, and regret any confusion we may have created in the Refund Filing that resulted in these questions. Please contact us with any further questions you may have.

Very truly yours,

Mark A. Bailey President and CEO

Attachment

c: Service List

Service List PSC Case No. 2012-00535

Jennifer B. Hans
Lawrence W. Cook
Dennis G. Howard, II
Assistant Attorneys General
1024 Capital Center Dr.
Suite 200
Frankfort, KY 40601

)

Mr. David Brevitz 3623 SW Woodvalley Terrace Topeka, KS 66614

Mr. Bion C. Ostrander 1121 S.W. Chetopa Trail Topeka, KS 66615

Mr. Larry Holloway 830 Romine Ridge Osage City, KS 66523

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Boehm, Kurtz & Lowry 36 E. Seventh St., Suite 1510 Cincinnati, Ohio 45202

Lane Kollen
J. Kennedy and Associates, Inc.
570 Colonial Park Dr., Suite 305
Roswell, Georgia 30075

Russell L. Klepper Energy Services Group, LLC 316 Maxwell Road, Suite 400 Alpharetta, Georgia 30009

Gregory Starheim
President & CEO
Kenergy Corp.
3111 Fairview Drive
P.O. Box 1389
Owensboro, KY 42302-1389

)

J. Christopher Hopgood, Esq. 318 Second Street Henderson, Kentucky 42420

Burns Mercer Meade County RECC 1351 Hwy. 79 P.O. Box 489 Brandenburg, Kentucky 40108

Thomas C. Brite, Esq. Brite & Hopkins, PLLC 83 Ballpark Road Hardinsburg, KY 40143

G. Kelly Nuckols
President and CEO
Jackson Purchase Energy Corporation
2900 Irvin Cobb Drive
P.O. Box 4030
Paducah, KY 42002-4030

Melissa D. Yates Denton & Keuler, LLP 555 Jefferson Street Suite 301 Paducah, KY 42001

Joe Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, Kentucky 40507

Shannon Fisk
Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 1675
Philadelphia, PA 19103



Big Rivers Electric Corporation PSC Order Case No. 2012-00535 Refund - Detail Exhibit 2

Rural kW and kWh Rate Differential Exhibit 1
Industrial kW and kWh Rate Differential Exhibit 1

4 0360 -0 0050 1 6950 0 0000

(C) (D) (E) (F) (G) **Power Factor** Adj \$/Green Aug Refund - 8-20 Aug kW Rate Variance 12/31 Power Ad Aug kWh(20-31) Rate Variance thru 8-31 JACKSON PURCHASE RURALS 137,192 \$ 553,706 91 \$ 214,338.16 26,822,923 \$ (134,114 62) 0 97 80,224 51 KENERGY RURALS 247,009 996,928 32 385,907 74 48,227,507 (241, 137 54) 144,770 20 MEADE CO RURALS 368,115.49 91,208 142,496 32 17,404,180 (87,020 90) 55 475 42 TOTAL RURALS 475,409 \$ 1,918,750.72 \$ 742,742.22 92454610 \$ (462,273.06) 280,470.13 KI-ACCURIDE 5.352 9.071 64 3,511 80 1,003,606 000 3,511 80 KI-ALCOA 113 191 54 7414 29,926 0.00 101 70 175 64 KI-ALERIS 26,774 45,381 93 17,567.20 5,876,280 0 00 17,567.20 KJ-AMG 3,391 70 2,001 1.312.92 242,347 000 33 46 1.346.38 KI-ARMSTRONG DOCK 9.595 16,263 53 6,295 56 1,540,972 000 6,295.56 KI-ARMSTRONG EQUALITY 3,087 5,232,47 2.025 47 558,220 000 2.025 47 KI-ARMSTRONG LEWIS CREEK 3,500 5,932,50 2,298.45 360,331 000 2.298.45 KI-ARMSTRONG MIDWAY 2,891 56 4.407 7,469 87 870,639 0 00 2,891 56 KI-DOMTAR 15,000 25,425 00 9,841 94 3,964,669 0.00 9,641 94 KI-DOTTKI 192 325 44 125 98 43,854 0.00 13.78 139 76 KI-ELK CREEK 750 1,271.25 492.10 155,468 0 00 492.10 KI-HOPKINS 19,052 100 169 50 65 61 0 00 65 61 KI-KIMBERLY CLARK 37,930 64,291 35 24 886 97 10,631,978 0.00 24 886 97 KI-PENNYRILE ENERGY 3,000 5,085 00 1,968 39 74,822 0 00 1.968 39 KI-PRECOAT 3,629 6,151 16 2,381 09 556,067 0.00 26.90 2,407 99 KI-SEBREE MINING - KMMC 100 169 50 65 61 11,204 0.00 65 61 IG-SEBREE MINING - STEAMPORT 8,050 10.25475 3 969 58 935,014 000 3 969 58 IG-SOUTHWIRE 7,227 12,249 77 4,741 85 1,784,632 0.00 4,741 85 KI-TYSON 11,690 19 814 55 7,670.15 2,771,296 7,670 15 0.00 KI-VALLEY GRAIN 2,090 3 542 55 1,371 31 451,202 0 00 190 93 1 562 24 TOTAL KENERGY INDUSTRIALS 142,587 93,555.48 31,801,589 \$ 366,77 \$ 93,922.25 JP-SHELL 2,117 3,588.32 1.389.03 184,472 0.00 1,389,03 TOTAL INDUSTRIALS 144,704 \$ 94,944.51 31,986,061 \$ 95,311.28 TOTAL RURALS AND INDUSTRIALS REFUNE 620,113 837,686.73 124,440,671 (462,273.06) 375,781.41 **CENTURY - SEBREE** Smelter Rate Differential Exhibit 1 268,316,160 0 002369 12/31 246,054.57 TOTAL REFUND BEFORE INTEREST ADDED 392,758,631 621,835.98

August 2013 Partial Billing Month - 8-20 thru 8-31

Big Rivers Electric Corporation PSC Order Case No. 2012-00535 Refund - Detail Exhibit 2

Rural kW and kWh Rate Differential Exhibit 1
Industrial kW and kWh Rate Differential Exhibit 1

JACKSON PURCHASE RURALS KENERGY RURALS MEADE CO RURALS	Sep kW 131,292 242,436 89,230	978 471 70 356 096 28	Sep kWh 52,701,500 95,494,851 33,755,720		Late Variance (263,507 50) (477,474.26) (168,778 60)	Power Factor Adj/Green Power Adj 2.50	Sep Refund 266,389 51 500,997 44 187,317 68	To	stal Aug 8-20 thru 8-31 and Sep Refund 346,614.02 645,767.64 242,793.10
TOTAL RURALS	461,958	\$ 1,864,462,49	181,982,071	\$	(909,760.36)		\$ 954,704.63	3	1,235,174.76
KI-ACCURIDE KI-ALCOA KI-ALERIS	5,390 108 26,486	9,136 05 183 08 44 893 77	2,168,870 72,780 14,968,640		0 00 0 00 0 00	262.73	9,136.05 445.79 44,893.77		12,647.65 621.63 62.460.97
KI-AMG	2,001	3 391 70	511,000		0 00	189 84	3,581 54	-	4,927.92
KLARMSTRONG DOCK	9,633	16,327 94	3,862,640		0 00		16,327 94	:	22,623.50
KLARMSTRONG EQUALITY	3,207	5 435 87	1,371,270		0 00		5,435 87	!	7,461.34
KI-ARMSTRONG LEWIS CREEK	3,500	5 932 50	938,720		0.00		5,932.50		8,228.95
KI-ARMSTRONG MIDWAY	4,646	7,874 97	2,078,700		0 00	88 14	7,963.11		10,854.67
KI-DOMTAR	18,000 183	25 425 00	10,800,000		000		25 425 00	1	35,266.94
KI-DOTIKI KI-ELK CREEK	163 750	310 19 1,271.25	82,780 388,945		000	38 99	349 18	ì	488.94
KHOPKINS	100	1,271.29	25,280		000		1,271.25 169.50	1	1,763.35 235.11
KLKIMBERLY CLARK	37,973	64 364,24	25,563,310		000		64,364,24	1	238.11 89.251.21
IG-PENNYRILE ENERGY	3,000	5,085 00	167,080		000		5,085.00	1	7.063.39
KI-PRECOAT	3,583	6,073,19	1,381,290		0.00		6,073.19	1	8.481.18
ICI-SEBREE MINING - KMMC	100	169 50	27,700		0 00		169 50	1	235.11
KI-SEBREE MINING - STEAMPORT	6,270	10,627 65	2,376,452		0 00		10.627 65		14,567,23
KI-SOUTHWIRE	7,238	12,263 33	4,420,550		0 00		12,263.33	1	17,006.18
KI-TYSON	11,833	20,056 94	5,974,160		0 00		20,056 94	1	27,727.09
KI-VALLEY GRAIN	2,233	3 784 94	963,600		0.00	583 08	4 368 02	L	5,830.26
TOTAL KENERGY INDUSTRIALS	143,231	\$ 242,776.59	78,143,777	\$	•	8 1,162.78	8 243,939.37	•	337,861.62
JP-SHELL	2,171	3,679.85	539,430		0.00		3,679 85		5,068.88
TOTAL INDUSTRIALS	145,402	\$ 246,456.44	78,683,207	\$	•		\$ 247,619.22	-	342,930.50
TOTAL RURALS AND INDUSTRIALS REFUNE	607,360	2,110,918.93	260,635,278	((909,760.36)		1,202,323.85		1,578,105.26
CENTURY - SEBREE			259,660,800		0.002369		615,138.44		861,191.01
TOTAL REFUND BEFORE INTEREST ADDED			520,296,078				\$ 1,817,460.29] ;	2,439,296.27