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PUBLIC SERVICE
COMMISSION

August 19, 2013

Via Personal Delivery

Mr. Jeff Derouen, Executive Director
Case No. 2013-00199
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Case No. 2013-00199 Ben Taylor and Sierra Club's Initial Requests for
Information to Big Rivers Electric Corporation

Dear Mr. Derouen,

Enclosed please find one original and ten (10) copies of Ben Taylor and Sierra Club's Initial Request for Information to Big Rivers Electric Corporation, filed today in the above-referenced matter via personal delivery. By copy of this letter, all parties listed on the Certificate of Service have been served via USPS and e-mail. Please place this document of file.

Sincerely,

Kristin A. Henry
Staff Attorney
Sierra Club
85 Second Street
San Francisco, CA 94105
Phone: (415) 977-5716
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kristin.henry@sierraclub.org

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AUG 19 2013

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS)
ELECTRIC CORPORATION, INC.)
FOR AN ADJUSTMENT OF RATES)

CASE NO. 2013-00199

**BEN TAYLOR AND SIERRA CLUB'S INITIAL REQUESTS FOR
INFORMATION TO BIG RIVERS ELECTRIC CORPORATION**

Intervenors Ben Taylor and Sierra Club (collectively "Environmental Intervenors") pursuant to the Kentucky Public Service Commission's ("Commission") July 18, 2013 Order ("July Order"), propound the following requests for information on the Big Rivers Electric Corporation's ("Big Rivers" or "BREC") request in the above captioned proceeding.

Big Rivers shall answer these requests for information in the manner set forth in the July 18 Order and by no later than the September 3, 2013 deadline set forth in the Appendix of the July 18 Order. Please produce the requested documents in electronic format to:

Kristin Henry
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85 Second Street, 2nd Floor
San Francisco, CA 94105
kristin.henry@sierraclub.org

Shannon Fisk
Earthjustice
1617 John F. Kennedy Blvd., Suite 1675
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sfisk@earthjustice.org

Thomas Cmar
Earthjustice
5042 N. Leavitt Street, Suite 1
Chicago, IL 60625
tcmar@earthjustice.org

Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Environmental Intervenors, 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).

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.

The Environmental Intervenors reserve the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

DEFINITIONS

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” “Big Rivers,” “BREC,” “Cooperative” or “Company” refers to Big Rivers Electric Corporation, and its affiliates, employees, and authorized agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all or each and every example of the requested information.

“CO₂” means carbon dioxide

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“CSAPR” means the Cross-State Air Pollution Rule

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody or control of the Companies regardless of where located, or (2) produced or generated by, known to or seen by the Companies, but now in their possession, custody or control, regardless of where located whether or still in existence.

Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email

correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

Without limitation, the term “control” as used in the preceding paragraphs means that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to Big Rivers;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“MFIR” means Margins For Interest Ratio

“NOx” means nitrogen oxides

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

“RFP” means Request For Proposal

“SCR” means selective catalytic reduction technology

“SO₂” means sulfur dioxide

“SSR” means System Support Resource

“TIER” means Times Interest Earned Ratio

PRIVILEGE

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit the Environmental Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable the Environmental Intervenors or the Commission to evaluate the validity of such claims.

REQUESTS FOR INFORMATION

1. Refer to page 8 of the Direct Testimony of Mark Bailey and page 8 of the Direct Testimony of Billie Richert.
 - a. Reconcile Ms. Richert’s statement that BREC, with the requested rate increase, would be only \$633,000 above the critical threshold of a 1.10 MFIR, with Mr. Bailey’s statement that the requested increase would put Big Rivers \$6.1 million above the same threshold.
 - b. Confirm how large a decline in revenues below the forecasted level BREC could incur without needing to request an additional rate increase.

2. Refer to page 8 of the Direct Testimony of Mark Bailey, page 10 of the Direct Testimony of Billie Richert, and page 11 of the Direct Testimony of Christopher Warren.
 - a. Reconcile the statements of Mr. Bailey and Ms. Richert that Big Rivers’ requested rate increase would lead to a projected TIER of 1.24 with Mr. Warren’s statement that Big Rivers’ projected TIER with the requested rate increase would be 1.10 in 2014, 1.11 in the fully forecasted test period, and 1.22 in 2015.
 - b. Confirm Big Rivers’ projected TIER for 2014, the projected test year, and 2015 with the requested rate increase.
 - c. If Mr. Warren’s testimony accurately identifies Big Rivers’ projected TIER with the requested rate increase, identifying Big Rivers’ resulting projected MFIR for 2014, the projected test year, and 2015.

3. Please refer to pages 9 to 10 of the Direct Testimony of Mark Bailey.
 - a. Please confirm that prior to the Century and Alcan rate cases, the demand charge was lower for rural customers than for large industrials; while under the Company’s proposal in this case the reverse would be true.

- b. If so, what accounts for this change?

4. Please refer to pages 8 to 11 of the Direct Testimony of Billie Richert and Exhibit Warren-3.
 - a. Is it the case that the requested rates are forecasted to achieve both a 1.24 TIER and 1.11 MFIR, as you seem to say on p.8 and p.11?
 - b. If these two values are equivalent, please explain the gap between them in light of the following: The formulas on Witness Richert's Direct Testimony of page 11 show that $TIER - MFIR = \text{Income Tax} / \text{Interest Expense on Long-Term Debt}$. However, Exhibit Warren-3 shows that BREC's tax payments are less than \$1,000, while interest expense is more than \$43 million. This appears incompatible with $TIER - MFIR = 0.13$.

5. Please refer to pages 10 and 12 of the Direct Testimony of Robert Berry.
 - a. If "off-system sales will remain depressed" because MISO prices are expected to be below BREC's marginal generation costs throughout 2013 and 2014, explain how it is possible that BREC's plants are routinely exceeding 90 percent dispatch rates in MISO.
 - b. For each of Big Rivers' generating units, identify the projected dispatch cost for each of the years 2014 through 2027.

6. Please refer to page 11 of the Direct Testimony of Robert Berry Direct Testimony. With regards to the "formal responses" that Big Rivers has provided to RFPs:
 - a. Identify the utility that issued each RFP, the date of the RFP, the amount of energy and/or capacity sought in the RFP, and the period of time for which each RFP was seeking such energy and/or capacity.
 - b. Identify the prices that Big Rivers bid for providing energy and capacity in each of its formal responses to the RFPs
 - c. Produce each RFP and Big Rivers' response to each such RFP.
 - d. Identify the results of each such RFP, including whether Big Rivers' formal response to each such RFP has been accepted or rejected.

7. Refer to page 11 of the Direct Testimony of Robert Berry. With regards to the "informally initiated discussions with other potential parties," identify:
 - a. Each other potential party that such discussions have been initiated with
 - b. The amount of energy or capacity that Big Rivers has offered in each such discussion

- c. The price at which Big Rivers offered energy and/or capacity in each such discussion
 - d. The results of each such discussion, including whether such discussions are still ongoing or whether Big Rivers' offer of energy and/or capacity has been rejected.
8. Refer to Witness Berry Direct Testimony on page 11. With regards to the multiple parties to whom Big Rivers has offered "the option to purchase the Coleman and Wilson Stations," identify:
- a. Each party to whom Big Rivers has offered the option to purchase the Coleman or Wilson Stations.
 - b. The prices at which Big Rivers offered to sell the Coleman and Wilson Stations.
 - c. The response to each such offer, including any price that any party offered to pay for the Coleman and/or Wilson Station.
9. Refer to page 12 of the Direct Testimony of Robert Berry. With regards to the RFPs issued "in the last six months . . . seeking long term power contracts for over 1,500MWs," identify:
- a. Each entity that issued one of those RFPs.
 - b. The date of each such RFP.
 - c. The amount of energy and/or capacity sought in each such RFP.
 - d. The period for which such energy and/or capacity was sought in each such RFP.
 - e. Any response by Big Rivers to such RFPs and produce such response.
10. Refer to page 13 of the Direct Testimony of Robert Berry. Identify any "new economic development opportunities" that have been announced or sited in the Big Rivers service territory over the past year.
11. Refer to page 13 of the Direct Testimony of Robert Berry. Identify any "existing load served by others" that Big Rivers could serve that has provided over the past year its "current wholesale provider . . . notice of its intent to terminate its long term wholesale agreement."
12. Refer to page 17 of the Direct Testimony of Robert Berry.

- a. Please confirm that the contracts among Big Rivers, Kenergy, and Century that were approved by the Commission in Case No. 2013-00221 have been executed.
- b. Has MISO determined at what Base Load Century may operate without Coleman Station being required to run for reliability purposes?
 - i. If yes, please describe MISO's determination and produce any documents reflecting that determination.
 - ii. If no, please explain why MISO has not yet provided a determination and when Big Rivers expects such a determination to be made.
- c. Regarding the exclusion of transmission revenues from Century in the forecast test year: Under the approved agreements between Century, BREC, and Kenergy, if Century continues to operate at the same load as in recent years, while buying all of its power from outside the BREC system, what level of recurring annual transmission revenues would BREC receive from Century or its suppliers?
- d. How much transmission revenue will BREC receive if Century operates at the baseload level determined by MISO that would allow Coleman to be idled?

13. Refer to page 20 of the Direct Testimony of Robert Berry.

- a. Produce, in machine readable format with formulas intact, the most recent version of Big Rivers' long-term financial model, including all inputs and outputs through the year 2028.
- b. Produce, in machine readable format with formulas intact, all production cost modeling, including all inputs and outputs, through the year 2028 used in the most recent version of Big Rivers' financial model.
- c. Provide any sensitivity analyses or alternate scenarios that were run for Big Rivers' production cost modeling or financial modeling, but that were not included in the most recent version of Big Rivers' financial model.

14. For Big Rivers' projections included in the company's application, long-term financial model, and production cost modeling:

- a. Identify the price per year for each of the years 2013 through 2028 projected for:
 - i. Market energy
 - ii. Market capacity
 - iii. Carbon dioxide
 - iv. Natural gas
 - v. Coal
- b. Identify and produce the source for each such projection.
 - i. If you contend that you are not able to produce a source for any of the above projections on the ground that such information is not in your possession but is solely in the possession of a third party, identify the

- name of the third party and its business address, and provide a narrative explanation as to why the company does not have the requested information in its possession and why the company is not able to produce the information to the Commission and the parties.
- c. Identify any other projections of market energy, market capacity, carbon dioxide, natural gas, or coal prices that Big Rivers created or reviewed but did not use in its application, long-term financial model, or production cost modeling.
15. Refer to page 13 of the Direct Testimony of Robert Berry. With regards to your contention that off-system market prices will increase to a level that would justify returning idled generating units to operating status in 2019:
- a. Confirm that the “idled generating units” referenced therein are Coleman and Wilson.
 - b. Identify and produce any market price projection upon which this contention relies.
 - c. Provide a narrative explanation of the expected changes in electricity markets that will make plants profitable in 2019 that are not profitable today.
 - d. Identify and produce any other projection of market prices that Big Rivers produced or reviewed but did not use as part of this analysis.
16. Refer to page 20 of the Direct Testimony of Robert Berry.
- a. How much would BREC’s costs be reduced if Coleman was sold or retired, rather than idled?
 - b. How much would costs be reduced if Wilson was sold or retired, rather than idled?
17. Please refer to Witness Williams’ Direct Testimony on page 6.
- a. Please provide a description of the Hyperion budgeting software used in the forecast development process.
 - b. Produce, in machine readable format with formulas intact, all of the modeling files (including input and output files) and workpapers produced for BREC by the Hyperion budgeting software package.
18. Please refer to Witness Williams’ Direct Testimony on page 6. Please provide the budget and financial plan approved by the Big Rivers Board of Directors in November 2012.

19. Please refer to Witness Barron Direct Testimony on page 6.
 - a. Please provide the April 2013 load forecast.
 - b. Please describe its principal differences from the previous BREC load forecast.

20. Refer to page 12 of the Direct Testimony of Lindsey Barron Direct Testimony on page 12.
 - a. Identify and produce the regression analyses that Big Rivers used to determine price elasticities of demand for rural customers.
 - b. For purposes of Big Rivers' long-term financial forecast, has Big Rivers performed any analyses of the difference between short-run and long-run price elasticity for its customers?
 - i. If so, please provide those analyses.
 - ii. If not, explain why not.
 - c. Identify and produce any studies or other documents that Big Rivers reviewed or relied upon in determining the price elasticities of demand for rural customers.
 - d. Explain why the price elasticities of demand identified in this proceeding are different than the values reported by Big Rivers in response to KIUC DR 1-35 in the Century rate case.

21. Please refer to Witness Barron Direct Testimony at pages 12-13, discussing the use of price elasticity in the 2013 load forecast.
 - a. State whether the 2013 load forecast assumes any price elasticity for large industrial customers.
 - b. If so:
 - i. Identify the industrial customer elasticity values.
 - ii. Provide the analyses that led to those values.
 - iii. Identify any studies or other documents relied upon in identifying such elasticity value.
 - c. If not:
 - i. Explain the reasons for excluding price elasticity effects on the large industrial customer class.
 - ii. Provide any analyses supporting the claim that any increases in electric prices for the large industrial customer class will not impact demand from such class.
 - iii. Identify any studies or other documents relied up in deciding to exclude price elasticity effects on the large industrial customer class.

22. Refer to Exhibit Warren-2.
 - a. Provide the breakdown of the Company's net utility plant in service, by individual plants.
 - b. Identify how much of the total Coleman represents.
 - c. Identify how much of the total Wilson represents.

23. Please refer to pages 13 to 14 of the Direct Testimony of Daniel Walker. With regards to Mr. Walker's testimony that BREC should be aiming for a TIER between 1.40 and 1.60 in order to attract capital and obtain an investment grade rating, but that a lower TIER of 1.24 is acceptable for a transition period:
 - a. Identify the duration of the transition period that would be acceptable.
 - b. How much additional revenue would be needed to get Big Rivers to a TIER of between 1.40 and 1.60 in the forecasted test period?
 - c. Is it possible for BREC to reach a TIER of 1.40 to 1.60 without an additional rate increase, beyond the increase requested in this case?
 - d. When should BREC plan on exiting the transition period with TIER of 1.24, and raising rates again to reach a TIER of 1.40 to 1.60?
 - e. With regards to Big Rivers' long-term financial forecast, identify the projected TIER for each of the years 2016 through 2028.
 - i. For each such year, identify the amount of additional revenue that would be needed to get Big Rivers to a TIER of between 1.40 and 1.60.
 - f. State whether simply increasing Big Rivers' TIER to the 1.40 to 1.60 range would be sufficient to attract capital and obtain an investment grade rating, or whether other steps would be needed?
 - i. If other steps would be needed, identify such steps?

24. Refer to page 6 of the Direct Testimony of Robert Berry. Provide a copy of the five-year benchmarking study completed in April 2013 regarding the reliability of the Big Rivers coal units.

25. Refer to page 13 of the Direct Testimony of Witness Lindsay Barron. With regards to the MetrixND software package used to compute the price elasticity of demand coefficients:
 - a. Describe what the MetrixND software does.
 - b. Identify the vendor of the MetrixND software package and state whether the software is proprietary software that requires a license in order to gain access to the files.

- c. Produce, in machine readable format with formulas intact, all of the modeling files (including input and output files) and workpapers produced for BREC by the MetrixND software package.
 - d. Please identify the assumptions, including any supporting documentation, which Big Rivers or its agents used as inputs in the MetrixND software package.
 - e. If a license is required to obtain access to any information in this request, please explain who Sierra Club should contact to either obtain that license or present information that Sierra Club or its experts already have a license for that model.
 - f. How much does BREC pay for the use of the MetrixND software?
26. Produce all of the following communications made since those that were produced in the Century rate case:
- a. between BREC and its creditors.
 - b. between BREC and MISO regarding SSR agreements.
 - c. between BREC and Century regarding SSR agreements.
27. Clarify the following regarding BREC's proposed approach to MATS compliance at Coleman and Wilson:
- a. Does BREC intend to defer installation of MATS controls at Coleman and Wilson while those units are idled?
 - i. If so, identify when BREC expects to carry out the MATS compliance projects on each of the Coleman and Wilson units.
 - b. If BREC does not intend to defer the MATS compliance projects at the Coleman and Wilson units, state whether you would seek recovery for the cost of those projects through any SSR agreement with MISO.
 - i. If so, identify any support for the contention that MISO will agree to provide SSR payments to cover the capital cost of installing pollution controls on a generating unit that the company expects to return to service.
28. Please identify the following (and specify and define the metric used) with respect to anticipated conditions in BREC's system during the forecasted test year:
- a. Peak demand.
 - b. Which generating units will be idled.
 - c. Peak capacity (without including any idled generating units).
 - d. Peak capacity (including any idled generating units).
 - e. Reserve margin (without including any idled generating units).

- f. Reserve margin (including any idled generating units).
29. State whether Big Rivers has evaluated the retirement, rather than idling, of any of its generating units as an option for mitigating the impact of the termination of the smelter contracts and/or of the decline in off-system sales revenues.
- a. If so:
 - i. Identify which unit or units were evaluated
 - ii. Explain the results of that evaluation
 - iii. Produce any report or other document regarding that evaluation
 - b. If not, identify and explain each reason why not.
30. Produce a copy of any forecast or projection of future CO₂ costs, taxes, or emissions allowances prices that has been prepared by or for Big Rivers.
31. With respect to EPA's GHG Tailoring Rule:
- a. Does the Company anticipate that any of its units would be subject to EPA's GHG Tailoring Rule? If so, when? If not, why not?
 - b. What impact does the Company anticipate the Tailoring Rule having on either the costs of operations of any of its units?
 - c. Please provide any work papers or modeling analysis that considers the cost impacts associated with the Tailoring Rule.
32. EPA recently issued a proposed New Source Performance Standard that would regulate greenhouse gas emissions from electric generating units. In this proposed rule, EPA stated that it soon plans to issue regulations for existing electric generating units. With respect to EPA's forthcoming rule regulating greenhouse gas emissions for existing electric generating units ("EGUs"):
- a. Does the Company anticipate that the forthcoming existing EGU greenhouse gas rule could impact any of its units? If so, what would be the expected cost of this rulemaking? If not, why not?
 - b. Has a cost for the forthcoming existing EGU greenhouse gas rule been taken into account in any of its production cost modeling or long-term financial forecast?
 - c. Please provide any work papers or modeling analysis that considers the cost

impacts associated with the forthcoming existing EGU greenhouse gas rule.

33. With regard to the potential impacts of the proposed EPA rule for Coal Combustion Residuals (CCR).
 - a. Does the Company anticipate that this pending regulation would impact any of its units? If so, what would be the expected cost of this rulemaking? If not, why not?
 - b. Has a cost for the pending Coal Combustion Residuals rule been taken into account in the modeling done by the Company? If not, how would such a cost impact its analysis?
 - c. Please provide any work papers or modeling analysis that considers the cost impacts associated with the CCR rule.

34. With regard to the potential impacts of CSAPR being reinstated by the U.S. Supreme Court or EPA issuing a new set of regulations to replace the vacated CSAPR.
 - a. Does the Company anticipate that such reinstated regulation or new regulation would impact any of its units?
 - i. If so, what would be the expected cost of this rulemaking?
 - ii. If not, why not?
 - b. Has a cost for the potentially reinstated regulation or new regulation been taken into account in the modeling done by the Company?
 - i. If so, explain how.
 - ii. If not, how would such a cost impact its analysis?
 - c. Please provide, in machine readable format with formulas intact, any work papers or modeling analysis (including input and output files) that considers the cost impacts associated with a potentially reinstated or new CSAPR regulation.

35. Produce a current curriculum vitae and list of testimony over the past six years for Daniel Walker.

36. For each of the Wilson, Green, Coleman, Reid, or HMP&L generating units:
 - a. Identify the estimated retirement date.
 - b. Produce any analysis or assessment of the economics of continued operation of such unit.
 - c. Produce any analysis or assessment of the impact that retirement of each unit

would have on capacity adequacy, transmission grid stability, transmission grid support, voltage support, or transmission system reliability.

- d. Identify any transmission grid upgrades or changes that would be needed to allow for the retirement of any of the units.
 - e. Produce any analysis or assessment of the need for the continued operation of each unit.
37. For each of the following existing, proposed, or potential regulatory requirements, produce any evaluation of the pollution controls that would be needed, or the estimated costs that would be incurred, to bring each of Big Rivers' coal-fired electric generating units into compliance with the requirement:
- a. 1-hour SO2 NAAQS.
 - b. Section 316(b) of the Clean Water Act.
 - c. Section 316(a) of the Clean Water Act.
 - d. Clean Water Act effluent limitation guidelines.
 - e. Clean Air Interstate Rule.
 - f. Ozone NAAQS.
 - g. PM2.5 NAAQS.
38. For each of Big Rivers' coal-fired assets:
- a. Provide the remaining book value (plant balance) at the start of 2013.
 - b. Provide the estimated market value of each unit at the start of 2013.
 - c. Describe how Big Rivers estimated the market value of each unit.

Respectfully submitted,



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Dated: August 16, 2013

CERTIFICATE OF SERVICE

I certify that I mailed a copy of Ben Taylor and Sierra Club's First Request for Information from Big Rivers Electric Corporation by e-mail and first class mail on August 19, 2013 to the following:

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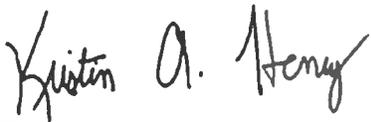
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