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RECEIVED

JUN 22 2018

PUBLIC SERVICE
COMMISSION

VIA OVERNIGHT MAIL

June 21, 2018

Gwen R. Pinson, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case Nos. 2017-00384

Dear Ms. Pinson:

Please find enclosed the original and ten (10) copies of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'s FIRST SET OF DATA REQUESTS TO BIG RIVERS ELECTRIC CORPORATION for filing in the above-referenced matter.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,

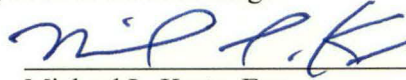


Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Attachment
cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail (when available) or by regular, U.S. mail, unless otherwise noted, this 21st day of June, 2018 to the following:



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Tyson Kamuf, Corporate Attorney
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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

JUN 22 2018

PUBLIC SERVICE
COMMISSION

In The Matter Of The Application Of: The 2017 Integrated : Case No. 2017-00384
Resource Plan of Big Rivers Electric Corporation :

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'s
FIRST SET OF DATA REQUESTS
TO
BIG RIVERS ELECTRIC CORPORATION

Dated: June 21, 2018

DEFINITIONS

1. "Document(s)" is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, memoranda, reports, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.
2. "Correspondence" is used in its customary broad sense and includes electronic email, including all attachments, and all written mail, messages and communications between the persons or parties named in the request.
3. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final, and whether or not referred to in Big Rivers' direct testimony.
4. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.
5. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
6. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
7. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
8. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
9. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
10. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
11. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
12. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
13. "BREC" or "Big Rivers" means Big Rivers Electric Corporation and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

**FIRST SET OF DATA REQUESTS OF KENTUCKY INDUSTRIAL UTILITY
CUSTOMERS, INC. TO BIG RIVERS ELECTRIC CORPORATION
Case No. 2017-00384**

- Q.1-1 In its 2017 IRP at page 100 Big Rivers stated that the “*Coleman Station units were idled in May 2014, and , therefore have not operated past the April 2015 compliance date for MATS; controls will not be required until the units are restarted.*” In its 2014 IRP at page 91 Big Rivers stated that it would cost nearly \$130 million to bring Coleman into compliance with MATS and other environmental rules. Is the \$130 million estimate still accurate? Please explain.
- a) Please provide all studies and memoranda that discuss the costs and economics of restarting Coleman.
- Q.1-2 When is the expected restart date of Coleman?
- Q.1-3 Big Rivers is currently using emission allowances from the idled Coleman plant for compliance with CSAPR. Is four years the maximum amount of time that Big Rivers can use Coleman allowances as stated on page 3-20 of the February 13, 2012 Sargent & Lundy Environmental Compliance Study? Please explain.
- Q.1-4 Please refer to your response to KIUC supplement data request 7 in case No. 2014-00166. There it is stated that Big Rivers will likely receive less allowances once Coleman has been idled for four years, which would be deemed to occur on December 31, 2018. Big Rivers further states that it will continue to evaluate compliance options for the remainder of the system after December 31, 2018, including “*lower sulfur fuel at Wilson and Sebree, potential FGD upgrade at Wilson, and the purchase of allowances.*”
- a) Please indicate your current plans for compliance beginning January 1, 2019 and provide all studies and memoranda that discuss such compliance.
- b) Please indicate the number of Coleman allowances that will be available to Big Rivers for 2019, 2020, 2021, 2022 and 2023.
- Q.1-5 If an FDG upgrade at Wilson is needed for compliance with CSAPR, is the projected cost of \$139 million as shown on Exhibit Berry-2 in Case No. 2012-00063 and identified in the Sargent & Lundy study still accurate? Please explain.
- Q.1-6 If HMP&L Station 2 is idled or retired, would that result in Big Rivers receiving additional CSAPR emission allowances? If yes, please indicate how many and for how long.
- Q.1-7 By year over the IRP study period, what is the expected revenue from the Missouri, Nebraska and KMEA sales.
- Q.1-8 Please provide Big Rivers most recent financial forecast and model.
- Q.1-9 Please provide the financial forecast and model that supports the 2017 IRP.
- Q.1-10 In Case No. 2012-00535, Mr. Berry’s Exhibit Rebuttal-2 provided the Lay-up Savings for both Wilson and Coleman. If there is an update to that Exhibit please provide it. If there is no update, then please indicate if that Exhibit is still accurate.

Q.1-11 Please provide the prospectus from Big Rivers' most recent bond offering.

Respectfully submitted,



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**COUNSEL FOR KENTUCKY INDUSTRIAL
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June 21, 2018