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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2017 INTEGRATED RESOURCE PLAN )  
OF BIG RIVERS ELECTRIC CORPORATION ) CASE NO. 2017-00384

**ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention ("Attorney General"), and submits these Supplemental Data Requests to Big Rivers Electric Corporation (hereinafter "Big Rivers" or "Company") to be answered by September 14, 2018, and 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 company receives or generates 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 for the Office of Attorney General.

(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 the Office of the Attorney General 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.

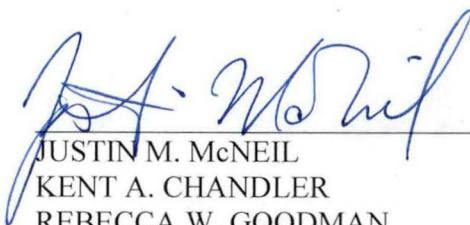
(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(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,

ANDY BESHEAR  
ATTORNEY GENERAL

A handwritten signature in blue ink, appearing to read "Justin M. McNeil", is written over a horizontal line.

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1. Refer to Big Rivers' Response to the Attorney General's Initial Request for Information, Item 8. Explain the nature and extent of the repairs and/or modifications which would be required to return Reid Unit 1 to service.
  - a. Using the above information, explain whether Big Rivers is able to provide an estimate of the additional years of lifespan which would then be calculated for Reid Unit 1. If so, provide the new projected lifespan.
  - b. If the remaining lifespan cannot be provided or calculated, provide the lifespan for comparable units with a similar age, run time and operating characteristics.
2. Refer to Big Rivers' Response to the Sierra Club's Initial Request for Information, Item 6. Explain the projected timeline for planning to restore interconnection service into MISO for the Coleman Station.
  - a. How long after a decision to restart Coleman would Big Rivers begin this process of entering the generation queue?
  - b. How long does it typically take to complete the generation interconnection queue process? Explain fully.
3. Refer to Big Rivers' Response to the Sierra Club's Initial Request for Information, Items 22 and 23. Big Rivers states that solar construction costs are projected to decrease in the future but that they "are currently not competitive with other power source options."
  - a. Explain how close the solar construction costs would need to be to other power sources in order to be considered competitive.
  - b. Big Rivers states that it will continue to evaluate solar options, and the Table in response to Item 23.b shows Solar-Fixed construction costs declining every year from 2017–2031 while Combined Cycle and Combustion Turbine costs increase each year. Fully explain how Big Rivers will approach its continuing evaluation of solar generation as those costs continue to fall.
4. Refer to Big Rivers' Response to PSC Item 1-6, which references Big Rivers' "April 4, 2017 Progress Report in response to the 2014 Focused Management and Operations Audit." Provide a copy of that April 4, 2017 Progress Report.
5. If Coleman was to return to service, what cost effect would there be on Wilson and the Green units, especially with regard to any applicable air pollution regulation credits?
6. Provide a quantification of any air pollution credits that will arise from the retirement of the HMPL units.
7. Under what circumstances does Big Rivers contemplate producing a study of costs necessary to achieve compliance with the CSAPR?
  - a. Does Big Rivers believe it will ever have to spend additional sums to meet compliance with the CSAPR? If so, describe in complete detail.

8. Refer to Big Rivers' response to the Attorney General's Initial Request for Information 1-7 (e). Does Big Rivers realistically believe that MISO market prices for both capacity and energy ever could support returning one or more of the Coleman units to service? If so, explain in detail.
9. Refer to Big Rivers' response to the Attorney General's Initial Request for Information 1-7 (g). Provide the staffing levels necessary to return one or more of the Coleman units to service, together with annual costs thereof for all such FTEs.
10. Reference Big Rivers' response to the Attorney General's Initial Request for Information 1-7 (i), which references the KPDES requirement for a CWA § 316(b) study to be started within six months of any restart of Coleman. How long does Big Rivers believe it would take to complete such a study?
11. In the event that any currently operating Big Rivers unit should require new pollution control equipment, does Big Rivers believe any such unit can remain price competitive with gas combined cycle units in the MISO markets? Explain in full detail.

*Certificate of Service and Filing*

Counsel certifies that an original and ten (10) photocopies of the foregoing were served and filed by hand delivery to Gwen R. Pinson, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

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This 17<sup>th</sup> day of August, 2018

  
Assistant Attorney General