

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                    |   |            |
|------------------------------------|---|------------|
| APPLICATION OF BIG RIVERS ELECTRIC | ) |            |
| CORPORATION FOR TERMINATION OF     | ) | CASE NO.   |
| CONTRACTS AND A DECLARATORY ORDER  | ) | 2018-00146 |
| AND FOR AUTHORITY TO ESTABLISH A   | ) |            |
| REGULATORY ASSET                   | ) |            |

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

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 26, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Electronic documents should be in portable document format (PDF), should be searchable, and should be appropriately bookmarked. 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 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.

BREC shall make timely amendment to any prior response 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 BREC fails or refuses to furnish all or part of the requested information, BREC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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 filing a document containing personal information, BREC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to the Application, Exhibit 4, page 13, regarding the net capacity factor for the Station Two Units for 2018. Provide the net capacity factors for the Units for 2013 through 2017.

2. Refer to BREC's response to Commission Staff's First Request for Information (Staff's First Request), Item 3. What impact, if any, will the termination of the contracts have on the accounting treatment for the depreciation expense related to Station Two?

3. Refer to BREC's response to Staff's First Request, Item 9.d., confidential Attachment 1, which displays the forecasted market prices and Station Two parameters used in each analysis presented in this case. Explain the large variances in the analyses for the following parameters:

- a. Energy Capacity Prices MISO, \$/kw – month;
- b. HH Natural Gas Price, \$/MMBtu;
- c. Non-Fuel VOM Prices/ \$/MWh.

4. Refer to BREC's 2017 IRP, page 104, where it states that the Company has suspended further development of any specific strategy to comply with the Clean Power Plan (CPP).

- a. Confirm this means the Company is making no new environmental expenditures related to compliance with the CPP.

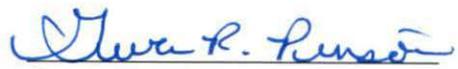
- b. Confirm that the analyses presented in this proceeding, future CPP compliance costs were included in the determination of the economic viability of the Station Two Units.

- c. Quantify the impacts of the analyses in this proceeding, to the extent possible, if no future CPP costs were included in the analyses and whether that would make any material difference in the findings and conclusions under each of the analyses.

5. Refer to BREC's response to Kentucky Industrial Utilities Customers, Inc.'s Initial Request for Information, Item 17, regarding the costs that will not cease to exist when Station Two no longer operates but will be borne 100 percent by BREC.

- a. Identify and quantify the costs that will not cease to exist when Station Two no longer operates.

- b. Assuming the Units operate through May of 2019, provide the impact on BREC's net margins and Times Interest Expense Ratio on a pro forma basis assuming removal of the revenues and non-recurring expenses associated with Station Two for the fiscal year ending May of 2019.



Gwen R. Pinson  
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DATED       **JUL 16 2018**      

cc: Parties of Record

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