

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DEMAND-SIDE MANAGEMENT FILING OF BIG	)	
RIVERS ELECTRIC CORPORATION TO	)	CASE NO.
IMPLEMENT A LOW-INCOME WEATHERIZATION	)	2019-00193
SUPPORT PROGRAM	)	

COMMISSION STAFF'S SECOND 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 in paper medium of the following information, with copies to all parties of record. The information requested herein is due on or before July 19, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

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 amendments 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, it 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a document containing personal information, BREC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Explain why BREC believes it is appropriate to be spending demand-side management (DSM) funds on health and safety measures rather than on weatherization measures.

2. Explain why DSM funds are proposed to be allocated for only HVAC upgrades and health and safety measures and not for other DSM weatherization initiatives.

3. If the amount spent per project on health and safety measures is limited to \$150, rather than the proposed \$1,500, explain whether there will be other weatherization projects to utilize the remaining funds.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED       **JUL 03 2019**      

cc: Parties of Record

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