

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BIG RIVERS)	
ELECTRIC CORPORATION FOR APPROVAL OF)	
ITS 2020 ENVIRONMENTAL COMPLIANCE)	
PLAN, AUTHORITY TO RECOVER COSTS)	
THROUGH A REVISED ENVIRONMENTAL)	
SURCHARGE AND TARIFF, THE ISSUANCE OF)	CASE NO.
A CERTIFICATE OF PUBLIC CONVENIENCE)	2019-00435
AND NECESSITY FOR CERTAIN PROJECTS,)	
AND APPROPRIATE ACCOUNTING AND)	
OTHER RELIEF)	

COMMISSION STAFF'S INITIAL 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 an electronic version of the following information. The information requested herein is due on April 13, 2020. The Commission directs BREC to the Commission's March 16, 2020 Order in Case No. 2020-00085,¹ regarding the filing of physical documents with the Commission. The Commission expects that original documents will be filed with the Commission within 30 days of the lifting of the current state of emergency.² Electronic documents shall in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC March 16, 2020) Order at 5–6. The Commission has suspended the filing of original paper documents with the Commission, except for the filing of confidential information, with the expectation that a physical copy be filed when the state of emergency has ceased.

² Any electronic email filed in this matter should be sent to PSCED@ky.gov, and each message should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 the 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 BREC 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 shall 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 paper 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. Refer to the application, pages 32 and 34. Explain the basis for the requested 10-year amortization period for the actual ash pond closure spending to date for Projects 13-1, 13-2, and 13-3.

2. Refer to the Direct Testimony of Michael T. Pullen (Pullen Testimony), page 20 of 57, lines 6–14. Provide the annual sulfur dioxide (SO₂) emissions allowance for the Coleman Station and Reid Unit 1, separately.

3. Refer to the Pullen Testimony, page 23 of 57, lines 5–9, regarding the gypsum waste by-product produced as a result of the scrubber process.

a. Based on the operating characteristics of the Coleman flue gas desulfurization (FGD) system and the typical operating characteristics of the Wilson Station, state how much gypsum is expected to be produced by the Wilson Station if it was retrofitted with the Coleman FGD system.

b. State whether the gypsum waste can be considered for beneficial reuse.

c. If the response to Item 3(b) above is yes, state how much revenue BREC can generate from marketing the gypsum by-product.

d. State whether BREC has factored revenues, if any, from the gypsum by-product as part of the operating and maintenance (O&M) costs of the proposed Project 12.

4. Refer to the Pullen Testimony, page 25 of 57, lines 14–16, regarding the evaluation of major pieces of equipment at the Coleman Station to be reused wherever appropriate. Explain whether BREC has performed a comprehensive study to determine whether major components at the Coleman Station can be reused at BREC's other generation facilities. If so, provide a copy of that study.

5. Refer to the Pullen Testimony, page 27 of 57, lines 5–8, regarding the decrease in the Wilson Station's fixed O&M cost and non-fuel variable O&M cost

associated with the implementation of Project 12. State the driver of these decreasing costs.

6. Refer to the Pullen Testimony, page 28 of 57, lines 8–16. Provide a schedule listing each permit that will be required in connection with Project 12 and the time line for obtaining each permit.

7. Refer to the Pullen Testimony, page 30 of 57, lines 5–7. Provide the SO₂ emissions efficiency of the Coleman FGD system, and state how much SO₂ the Wilson Station will emit on an annual basis if the station was retrofitted with the Coleman FGD system.

8. Refer to the Pullen Testimony, page 32 of 57, lines 16–20. Provide the anticipated closing dates based upon the proposed changes to the Disposal of Coal Combustion Residuals from Electric Utilities Rule (CCR Rule).

9. Refer to the Pullen Testimony, pages 4–12. Provide an explanation as to the types of modifications that may be required by the Kentucky Division of Waste Management with respect to Project 13-1, the proposed hybrid closure-in-place of the Green Station ash pond. Include in this explanation any cost estimates associated with each potential modification.

10. Refer to the Pullen Testimony, page 37 of 57, regarding the U.S. Court of Appeals for the District of Columbia Circuit's decision in the *Util. Solid Waste Activities Grp. (USWAG) v. EPA*, 901 F.3d 414 (D.C. Cir. 2018), and the U.S. Environmental Protection Agency's review of the CCR Rule regarding, among other things, the exemption of legacy ponds. State when the EPA is expected to finalize the revisions to the CCR Rule that would include regulation of legacy ponds. Also, state when the

Kentucky Division of Waste Management will finalize its regulations that are expected to include the regulation of ash ponds as a special waste facility.

11. Refer to the Pullen Testimony, page 40 of 57, lines 10–12, regarding the dewatering and treatment process. Fully explain how BREC will implement the dewatering and treatment process for the Coleman Station ash ponds.

12. Refer to the Pullen Testimony, page 46 of 57, lines 5–11. With respect to Phase II of the Wilson landfill, provide the current capacity of the Phase II landfill (in terms of cubic yards of CCR material), and state when the landfill is expected to reach capacity.

13. Refer to the Pullen Testimony, Exhibit Pullen-5, pages 6–7 of 7, regarding the reference to “the requirements of the Wilson Phase I landfill Agreed Order (“Agreed Order”).” Explain in detail the reference to the Agreed Order, and provide a copy of this Agreed Order.

14. Refer to the Direct Testimony of Paul G. Smith, page 22 of 43, regarding the Wilson FGD system. Provide the net book value of the entire Wilson FGD system as of December 31, 2019.

15. Refer to the Direct Testimony of Michael T. Hoydick (Hoydick Testimony), pages 4–5 of 13, concerning the performance and maintenance issues related to horizontal FGD systems like the existing Wilson FGD system.

a. Regarding the performance limitation of the horizontal flow configuration, provide the current industry standard for emission performance for FGD systems.

b. Other than gypsum scaling and gas flow maldistribution, provide examples of other operational issues that is related to horizontal FGD systems.

16. Refer to the Hoydick Testimony, page 11 of 13, lines 6–14, regarding the performance of the Coleman scrubber once it has been retrofitted at the Wilson Station. State whether Amec Foster Wheeler Industrial Power Company has any experience performing this type of retrofit. Also, explain whether the Coleman Station being idled since 2014 will have any impact (either positive or negative) on the performance of the Coleman FGD, assuming that BREC is authorized to retrofit the Wilson Station with the Coleman FGD components.

17. Refer to the Direct Testimony of Samuel E. Yoder Testimony, page 8 of 13, regarding the FGD wastewater treatment modifications at the Green Station to meet certain provisions of the CCR Rule and the Steam Electric Power Generating Effluent Guidelines and Standards (ELG Rule). Provide the specific regulation that is referenced with respect to the CCR Rule and ELG Rule.



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cc: Parties of Record

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