

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 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 an electronic version of the following information. The information requested herein is due on May 4, 2020. The Commission directs BREC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be 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 Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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, page 2, lines 17–23; the Direct Testimony of Paul G. Smith, page 12 of 43, lines 5–6; Case No. 2012-00535,² final Order, page 7; and Case No. 2013-00199,³ final Order, pages 19–20. Confirm that, excluding deferred depreciation expense, the Coleman Station Flue Gas Desulfurization system (Coleman FGD) is currently recovered through BREC’s base rates. If this cannot be confirmed, explain. If confirmed, explain how BREC plans to treat the components of the Coleman FGD that BREC proposes to transfer to the Wilson Station in its Base Environmental Surcharge Factor.

2. Refer to the Direct Testimony of John Wolfram, page 15 of 16, lines 13–19, and BREC’s response to Commission Staff’s First Request for Information (Staff’s First Request), Item 3(d). Confirm that BREC will include proceeds from the sale of gypsum and fly ash created at the Wilson Station in its monthly environmental surcharge calculation. If confirmed, provide the approximate percentage increase in BREC’s overall member bills associated with the 2020 Plan including estimated revenues from the sale of gypsum and fly ash as part of the projected operating and maintenance costs associated with Project 12.

3. Refer to BREC’s confidential response to Staff’s First Request, Item 7. Explain why the annual sulfur dioxide emissions for the Wilson Generating Station for years 2026–2028 is significantly different from the other years shown in the chart.

² Case No. 2012-00535, *Application of Big Rivers Electric Corporation for an Adjustment of Rates* (Ky. PSC Oct. 29, 2013).

³ Case No. 2013-00199, *Application of Big Rivers Electric Corporation for a General Adjustment in Rates Supported by Fully Forecasted Test Period* (Ky. PSC Apr. 25, 2014).

4. Refer to BREC's response to Staff's First Request, Item 8, regarding the closure of the Green Station Ash Pond. Explain why the intended closure of the Green Station Ash Pond is projected to be two years sooner than the proposed regulatory closure date.

5. Refer to BREC's response to Staff's First Request, Item 12. Provide the estimated life expectancy of the Wilson Phase II landfill if the request to install the Coleman FGD at the Wilson Station is approved. Also, provide the life expectancy of the Wilson Station.



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DATED APR 21 2020

cc: Parties of Record