COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION FROM NOVEMBER 1, 2016 THROUGH OCTOBER 31, 2018

CASE NO. 2019-00007

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 an electronic version of the following information. The information requested herein is due on March 25, 2019. Responses to requests for information 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.

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 they obtain 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 their 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 response to Commission Staff's First Request for Information (Staff's First Request), Item 3, page 2 of 4, and page 4 of 4.

a. Provide an update on the state the coal inventory level in tons and provide the number of days' supply for the Station Two units.

 Explain if BREC has any plans to sell or transfer any existing coal that remains at the Station Two units.

2. Refer to the response to Staff's First Request, Item 11. Explain why the changes to BREC's written policies and procedures regarding its fuel procurement were made.

3. Refer to the response to Staff's First Request, Item 15, page 5 of 11. For the Green Station Unit #1, refer to the repeated explanation of, "Unit was removed from

-2-

service, due to a reheat outlet boiler tube leak." Explain if BREC has addressed or is planning to address a permanent repair to the leak.

4. Refer to the response to Staff's First Request, Item 22, Attachment 1. Given that, with the exclusion of November 2016, the Fuel Adjustment Clause factor has remained at a charge for almost the entirety of the period under review, explain why BREC requests no change in the base fuel cost despite the trend.

5. Refer to the response to Staff's First Request, Item 22, Attachment 1, column (f).

a. Confirm the Over/Under Recovery amount for August 2017.

b. Confirm the Over/Under Recovery amount for September 2017.

6. Refer to the Direct Testimony of Mark McAdams, page 3 of 8. Explain who pays the difference in cost when an alternative mode of transportation is required due to shipment rescheduling.

7. For the period under review, describe how often the severance tax on Kentucky coal effects BREC's decision to purchase coal mined in Kentucky.

CGwen R. Pinson Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

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cc: Parties of Record

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