

SEP 05 2019

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF BIG RIVERS	)	
ELECTRIC CORPORATION FOR	)	CASE NO. 2019-00269
ENFORCEMENT OF RATE AND	)	
SERVICE STANDARDS	)	

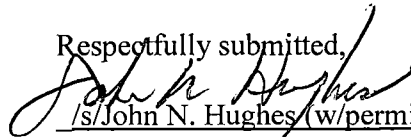
CITY OF HENDERSON, KENTUCKY  
 AND HENDERSON UTILITY COMMISSION, d/b/a  
 HENDERSON MUNICIPAL POWER & LIGHT'S  
 RESPONSE TO BIG RIVERS ELECTRIC CORP.'S  
 MOTION FOR INFORMAL CONFERENCE

The City of Henderson, Kentucky, and the Henderson Utility Commission, d/b/a Henderson Municipal Power & Light (jointly referenced hereinafter as "Henderson"), by counsel, and pursuant to 807 KAR 5:001(5), state as follows in response to the Motion of Big Rivers Electric Corp. ("Big Rivers") for an informal conference:

The conference Big Rivers requests is premature and should not be scheduled, if at all, until after the parties exchange data requests and responses and provide responses to any Commission staff requests. Until such time as this information is exchanged, the parties are unable to identify those issues which are capable of simplification or clarification or which may aid in the handling and disposition of the case.

Additionally, it should be noted that the parties have engaged in protracted settlement discussions in an attempt to resolve their disputes and have been unable to reach an agreement. Henderson is willing to entertain any new or different settlement proposals Big Rivers wishes to advance. However, it is questionable whether further settlement discussions would be productive.

Respectfully submitted,

  
/s/John N. Hughes (w/permission)

Hon. John N. Hughes  
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and

/s/Sharon W. Farmer

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Hon. Sharon W. Farmer  
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*Attorneys for Henderson Utility Commission, d/b/a  
Henderson Municipal Power & Light*

/s/Dawn Kelsey (w/permission)

Hon. Dawn Kelsey  
City Attorney  
City of Henderson  
222 First Street  
Henderson, Kentucky 42420  
*Attorney for City of Henderson*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was forwarded this 5th day of September, 2019, via U.S. Mail, postage prepaid, or via facsimile, electronic mail, and/or hand delivery, to the following:

Tyson Kamuf  
Laura Chambliss  
Big Rivers Electric Corp.  
201 Third Street, P.O. Box 727  
Henderson, Kentucky 42419-0024

Michael L. Kurtz  
Kurt J. Boehm  
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36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202

*Attorneys for Big Rivers Electric Corp.*

Original to:

Ms. Gwen R. Pinson  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard, P.O. Box 615  
Frankfort, Kentucky 40602-0615

/s/Sharon W. Farmer