

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF BIG)	
RIVERS ELECTRIC CORPORATION AND)	
MEADE COUNTY RURAL ELECTRIC)	CASE NO.
COOPERATIVE CORPORATION FOR (1))	2019-00365
APPROVAL OF CONTRACTS FOR ELECTRIC)	
SERVICE WITH NUCOR CORPORATION; AND)	
(2) APPROVAL OF TARIFF)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO BIG RIVERS ELECTRIC CORPORATION,
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION,
AND NUCOR CORPORATION

Big Rivers Electric Corporation (BREC), Meade County Rural Electric Cooperative Corporation (Meade County RECC), and Nucor Corporation (Nucor), pursuant to 807 KAR 5:001, are to file with the Commission the original and an electronic version of the following information. The information requested herein is due on August 13, 2020, at 1:00 p.m., Eastern Daylight Time. The Commission directs the Joint Applicants and Nucor to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. 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.

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, Meade County RECC, and Nucor (collectively the Parties) shall make timely amendment to any prior response if the Parties obtain information which indicate that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Parties fail or refuse to furnish all or part of the requested information, the Parties 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, the Parties shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

For the Parties:

1. Refer to the Direct Testimony of Robert W. Berry, Berry-Ex. 2 (Nucor Retail Electric Service Agreement).

a. State whether the Nucor Retail Electric Service Agreement provides for the re-opening of the agreement or a current provision to address the On-Peak Energy Charge and Off-Peak Energy Charge that are set forth in Exhibit C to the Nucor Retail Electric Service Agreement in the event of the implementation of a carbon price or tax at the national, regional, or state level.

(1) If the Nucor Retail Electric Service Agreement contains such a provision, identify where in the agreement this provision is located.

(2) If the Nucor Retail Electric Service Agreement does not contain such provision(s), state whether the Parties would be agreeable to amending that agreement to include a provision that would allow for the re-opening of the agreement to address the On-Peak Energy Charge and Off-Peak Energy Charge that are set forth in Exhibit C to the Nucor Retail Electric Service Agreement in the event a carbon price or tax is implemented at the national, regional or state level.

For BREC and Meade County RECC

1. Explain the impact to BREC and Meade County RECC's members under the terms of the Nucor Retail Electric Service Agreement should a carbon price or tax be implemented at the national, regional or state level at any time during the term of the Nucor Retail Electric Service Agreement and state whether BREC and/or Meade County RECC's members will be exposed to any risk under the agreement if a national, regional

or state carbon price or tax is imposed. Responses should differentiate between the contract phases of the Nucor Retail Electric Service Agreement.

For BREC:

1. If, for instance, in the event a \$15 per ton price on carbon emissions was placed on BREC's generation units, explain how that would affect the economics of the Nucor Retail Electric Service Agreement with Nucor in each of the contract phases.



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Acting Executive Director
Public Service Commission
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DATED AUG 11 2020

cc: Parties of Record

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