

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF BIG RIVERS ELECTRIC)	2020-00250
CORPORATION FROM NOVEMBER 1, 2019)	
THROUGH APRIL 30, 2020)	

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 within 14 days of the date of this request. The Commission directs BREC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085,¹ 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.

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

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.

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 that indicates 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 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 BREC's response to Staff's First Request for Information (Staff's Request), Item 3, pages 2 of 4 and 4 of 4.

a. The status of the Reid Station does not appear to have changed. Explain the value of the remaining coal stored at the Reid Station, and how BREC intends to dispose of the coal.

b. Provide a status update on the retirement plans for the Coleman and Reid Stations.

2. Refer to BREC's response to Staff's Request, Item 9. Explain whether BREC conducts any on-site reviews and inspections of mining operations, scales, and sampling systems and whether it has uncovered or corrected any issues with fuel suppliers or transportation providers.

3. Refer to BREC's response to Staff's Request, Item 12, pages 3 of 6 through page 6 of 6.

a. Explain the meaning of the term "Off-System Adjustment."

b. Under the MW Commitment column, explain the meaning of the total number provided in the second row.

c. The date of both purchases and sales are imprecise and in some cases, the only distinguishing feature appears to be the Total number under the MW Commitment column. In the case where there are apparently multiple transactions with the same electric utility, explain what each individual row represents.

d. The type of information provided in the highlighted rows appears to be quite similar to the information in the non-highlighted rows. Provide further explanation as to what competitively sensitive information in the highlighted rows distinguishes it from the information provided in the non-highlighted rows and why it's competitively sensitive.

4. Refer to BREC's response to Staff's Request, Item 16. Explain how a generation unit can have a negative capacity factor.

5. Explain whether the Black Lung Disability Trust Fund Excise Tax has affected any existing fuel contracts for Big Rivers for the period under review through 2020.



Kent A. Chandler
Acting Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 09 2020

cc: Parties of Record

*Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Big Rivers Electric Corporation
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Tyson Kamuf
Corporate Attorney
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420