

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2020 INTEGRATED)	CASE NO.
RESOURCE PLAN OF BIG RIVERS)	2020-00299
ELECTRIC CORPORATION)	

COMMISSION STAFF'S POST-HEARING 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 December 31, 2021. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 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 Integrated Resource Plan (IRP), Chapter 4, Section 4.7, pages 83–88, Tables 4.3–Table 4.7, and BREC's response to Commission Staff's First Request for Information, Item 20.

a. Provide updated versions of Table 4.3, Table 4.4, Table 4.5, Table 4.6, and Table 4.7 using the \$/kW capacity costs of the converted Green Station approved in Case No. 2021-00079.²

² Case No. 2021-00079, *Electronic Application of Big Rivers Electric Corporation for a Certificate of Public Convenience and Necessity Authorizing the Conversion of the Green Station Units to Natural Gas-Fired Units and an Order Approving the Establishment of a Regulatory Asset* (Ky. PSC June 23, 2021), Order.

b. Provide updated versions of Table 4.3, Table 4.4, Table 4.5, Table 4.6, and Table 4.7 using the \$/kW capacity costs of the natural gas combined cycle unit that BREC determined was optimal based on its IRP.

c. Explain how using the capacity costs of the converted Green Station and the optimal natural gas combined cycle unit effect the results of the Total Resource Cost (TRC) test.

2. Refer to the November 23, 2021 Hearing Video Transcript (HVT) at 12:36:30 in which Mr. Pogue and Mr. Hoyt discussed a discrepancy between the results of the demand-side management (DSM) study reported in the IRP and an original or initial study provided by Mr. Hoyt.

a. Provide a copy of the initial study provided by Mr. Hoyt to BREC.

b. Identify and explain any discrepancy between the results of the DSM study reported in the IRP and those in the initial study discussed at the hearing.

3. Refer to the IRP, Table 8.10, page 160, the November 23, 2021 HVT at 11:04:20–11:07:43, BREC’s response to Commission Staff’s First Request for Information, Item 56.d., and BREC’s response to Commission Staff’s Second Request for Information, Item 26.

a. Identify where in its IRP BREC discussed its D-rate analysis, including specifically any discussion of its use of the Effective Load Carrying Capability (ELCC) standard to determine the MISO capacity credit it would receive for solar generation assets.

b. Regardless of whether it is specifically discussed in the IRP, explain in detail how BREC utilized the ELCC standard in its modeling to determine the reserve capacity and capacity margins, whether that is reflected in BREC's Optimal LT Plan base case (preferred plan) or in any of the scenario evaluations or sensitivity analyses. If ELCC is not reflected in the IRP results as presented, provide an updated table to BREC's response to Commission Staff's First Request for Information, Item 56.d. that reflects the impact of MISO ELCC implementation.



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DATED DEC 01 2021

cc: Parties of Record

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