

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BIG RIVERS	)	
ELECTRIC CORPORATION FOR A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	
AND NECESSITY AUTHORIZING THE	)	CASE NO.
CONVERSION OF THE GREEN STATION	)	2021-00079
UNITS TO NATURAL GAS-FIRED UNITS AND	)	
AN ORDER APPROVING THE	)	
ESTABLISHMENT OF A REGULATORY	)	
ASSET	)	

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 on April 16, 2021. The Commission directs BREC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

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 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 BREC's response to Commission Staff's First Request for Information (Staff's First Request), Item 2.

- a. Identify any parties that have expressed interest in partnering with BREC at a later date in constructing the NGCC plant, and BREC's anticipated dates of a future partnership.

b. Explain whether BREC has developed any contingency plans if it is, again, unable to find a partner or partners in the future for a NGCC plant.

c. Given BREC's projected capacity needs and shortfalls, explain in detail why BREC is not simply pursuing the NGCC plant on its own.

2. Refer to BREC's response to Staff's First Request, Item 3(b). Discuss any current or planned requirement for firm gas supply.

3. Refer to BREC's response to Staff's First Request, Item 14, in which BREC confirmed that it does not expect to meet its Planning Reserve Margin Requirement for MISO Zone 6 if the converted, or re-fired, Green Station units are taken out of service at the end of BREC's proposed useful life of seven years.

a. Given that projected capacity shortfall and BREC's confirmation that the re-fired units could continue operating beyond seven years, explain why the relative costs and benefits of the project proposed herein should not be evaluated over a longer period than proposed by BREC.

b. State whether BREC evaluated the relative costs and benefits of the project proposed herein against other projects over a longer period, and if so, identify the alternatives against which BREC evaluated the proposed project and the period over which BREC performed the evaluation, and provide a copy of any such cost-benefit analysis.

c. State whether BREC identified any point or points beyond the period evaluated in the application at which an alternative becomes more economical, and if so, identify each alternative that was determined to be more economical and the period at which the alternative was determined to be more economical.

4. Refer to BREC's response to the Office of the Attorney General's Initial Request for Information (Attorney General's First Request), Item 17. Explain why BREC anticipates the re-fired Green Station units will not be dispatched as often as the current Green Station units, including specifically whether it is due to a projected change in the cost to operate those units; the addition of other, lower cost units in MISO Zone 6; or some combination thereof.

5. Refer to BREC's response to the Attorney General's First Request, Item 18. Provide a copy of the analysis referred therein, and provide any necessary explanation of the analysis.

6. Provide a copy of BREC's request to the U.S. Environmental Protection Agency for approval of a site-specific alternative deadline to initiate closure pursuant to 40 C.F.R. § 257.103(f)(2) for the ash pond located at Green Station.

7. Provide a copy of BREC's notification of intent to close the ash pond located at Green Station under the alternative closure requirements found at 40 C.F.R. § 257.103(a)(1) posted on BREC's CCR compliance website in October 2019, including any attachments to the notification, regardless of whether BREC continues to maintain a copy of the notice on its CCR compliance website.

8. Provide the projected costs of the plan expressed in the October 2019 notice, provide any cost-benefit analysis performed comparing the plan in the October 2019 notice and the plan proposed in this matter, and provide and explain each basis for why BREC changed its plan from the plan in the October 2019 notice to the plan in the proposed in this matter.

9. Identify each ash pond or other surface impoundment owned or controlled by BREC that is larger than 40 acres, and for each such ash pond or surface impoundment, provide its size and location.

10. State whether the acreage used to determine the closure timeframes for surface impoundments in 40 C.F.R. § 257.103(f)(2)(iv) is based on the size of each impoundment, the size of all such impoundments at a single location, or some other measure, and explain each basis for BREC's response.

11. Confirm that under the alternative deadline to initiate closure pursuant to 40 C.F.R. § 257.103(f)(2) that the CCR surface impoundments at the Coleman Station did not have to close until October 17, 2028, five years after BREC contends that the Green Station CCR surface impoundments would need to close. If BREC is not able to confirm, explain each basis why it is not able to confirm.

12. State whether BREC investigated the possibility of continuing to operate some or all of the coal-fired generation units at the Coleman Station beyond 2022 with a closure date for the CCR impoundments in October 2028 pursuant to 40 C.F.R. § 257.103(f)(2)(iv)(B) to provide more time to develop additional capacity, and if not, explain why that possibility was not investigated. If that possibility was investigated:

- a. Explain how it was investigated;
- b. Provide and explain each reason why BREC determined that closing some or all of the coal-fired generation units at the Coleman Station later and continuing to operate them longer was not a viable short term solution to BREC's generation capacity shortfalls; and

c. Provide and explain any cost-benefit analysis BREC performed that included continuing to operate any coal-fired generation units at the Coalman Station.

13. Explain whether the special waste landfill, as distinguished from any ash ponds or CCR service impoundments, located on or near the site of the Green Station coal-fired units could or could have accepted CCR waste from the Green Station coal-fired units. If so, state how long it could have continued to accept such waste both with and without material capital investment to the site. If not, explain why in detail.

14. Confirmed that BREC intends to operate the re-fired Green Station units as peaking units, and if that cannot be confirmed, please explain each basis why it cannot be confirmed.

15. Assuming BREC could continue to use the relevant coal ash pond without any material upgrades, explain whether it would be economical to continue to operate the Green Station coal-fired units, and explain whether the coal-fired units could be operated in the manner in which BREC intends to operate the re-fired units.

16. Describe the process timeline of the ash pond closure to meet the October 17, 2023 deadline, starting from June 1, 2022.

  
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Linda C. Bridwell, PE  
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DATED APR 08 2021

cc: Parties of Record

Case No. 2021-00079

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