

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	)	CASE NO.
AND NECESSITY TO CONSTRUCT A 161 KV	)	2021-00275
TRANSMISSION LINE IN MCCRACKEN	)	
COUNTY, KENTUCKY	)	

COMMISSION STAFF'S FIRST 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 is due on October 29, 2021. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 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

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<sup>1</sup> 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).

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 the Application, page 6, lines 1–2 and Direct Testimony of Michael T. Pullen (Pullen Testimony) page 6. Assuming the 161 kV line is built and the anticipated cyber currency mining economic development occurs, explain how much of the 100 MW capacity will be available to serve additional economic development.

2. Refer to the Application, page 6, lines 15–17 and Exhibit D. Exhibit D pages 1–3 contain explicit indications of transmission line overbuild. However, pages 4–7 do not contain such indications. Explain whether the transmission line segments illustrated on pages 4–7 represent Greenfield Construction.

3. Refer to the Application, pages 6, lines 17–20, page 11, lines 11–16, and the Pullen Testimony page 12 lines 14–20. If the proposed line should have to be moved up to 500 feet on either side of the centerline anywhere along the proposed route, explain whether this would necessitate acquiring additional easements from landowners.

4. Refer to the Application, page 8, lines 2–9. Explain whether the existing 69 kV line will remain hot during the construction and overbuild of the new 161 kV line.

5. Refer to the Pullen Testimony, page 6, lines 6–16 and page 9, lines 1–9. Explain whether the new 161 kV line will alleviate any contingencies that may have been previously identified by MISO and, if so, explain those contingencies.

6. Refer to the Pullen Testimony, page 9, lines 2–9. State whether the current transmission system is experiencing reliability issues, and if so provide a detailed explanation of the issues experienced.

7. Refer to the Application, page 11, lines 17–23, page 12, lines 1–13, and the Pullen Testimony page 11, lines 10–19, and page 12, lines 1–2. Provide a detailed analysis and documented support for the legal conclusion that projects B and C are both extensions in the ordinary course of business and therefore neither project requires a CPCN.

8. Refer to the Application page 12, lines 8–13, and the Pullen testimony page 12, lines 13–20.

a. State the unexpected conditions to which BREC is referring that would require moving the proposed location of the West Paducah Substation; include a discussion of each condition and BREC's assessment of the condition's reasonable likelihood of existence.

- b. Provide all alternative locations for the proposed West Paducah Substation.
- c. Provide the estimated cost associated with moving the proposed location.



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DATED   OCT 14 2021  

cc: Parties of Record

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