

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)	CASE NO.
NECESSITY TO CONSTRUCT A 161 KV)	2022-00012
TRANSMISSION LINE IN HENDERSON)	
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 March 21, 2022. 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

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).

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, generally. Explain whether an environmental impact assessment is required or has been completed for the proposed projects. If so, provide a copy of the assessment.

2. Refer to the Application, generally. Provide copies of any public comments received regarding the proposed line and explain whether any public meetings have been held regarding the proposed line and route.

3. Refer to the Application, page 2, lines 8–17 and page 5, lines 10–14. Provide a cost benefit study demonstrating that the projects are cost effective.

4. Refer to the Application, Exhibit A, Direct Testimony of Christopher S. Bradley (Bradley Testimony), page 3, lines 1–8. Explain whether the new Pratt paper mill will self-supply any portion of its energy requirements.

5. Refer to the Application, Exhibit A, Bradley Testimony, page 3, lines 14–16. Provide a detailed map showing the existing and re-routing pathways of the lines into the switching station.

6. Refer to the Application, Exhibit A, Bradley Testimony, page 3, lines 17–21 and page 4, lines 1–7. Provide a detailed drawing of the switching station showing the existing and proposed line termination and configurations.

7. Refer to the Application, Exhibit A, Bradley Testimony, page 4, lines 9–13. Explain whether an existing or new 12 kV distribution circuit will be served from the proposed 161/12.47 kV substation (Project C).

8. Refer to the Application, Exhibit A, Bradley Testimony, page 5, lines 1–8. Provide the anticipated load of the new Pratt paper mill, the mill combined with the estimated total load growth as a result of the new mill, and the anticipated impact on BREC's reserve margin in each scenario.

9. Refer to the Application, page 5, lines 7–9. State whether the current transmission system would experience reliability issues if the new Pratt paper mill were to be served from existing 161 kV transmission lines. If so, provide a detailed explanation of the issues that would be experienced, including any MISO transmission studies of the relevant existing and proposed transmission lines.

10. State whether alternatives to the proposed projects were considered to enable BREC to supply load to the new Pratt paper mill.

11. For all alternatives identified in Item 10, provide cost estimates and an analysis of why the alternative was not chosen.

12. Refer to the Application, page 3, lines 1–9. Explain the need to enhance reliability to existing retail members served by Kenergy.

13. Refer to the Application, page 9, lines 1–4.

a. Explain why BREC anticipates needing to move the location of the proposed transmission line up to 500 feet on either side of the centerline.

b. Explain all measures taken by BREC, in the planning process for the proposed transmission line, to avoid the need to move the proposed transmission line up to 500 feet on either side of the centerline from location shown on the maps filed with the application.

14. Refer to the Application, Exhibit A, Bradley Testimony, page 7, lines 1–4. Explain how the construction costs recovered through the MISO Attachment O Formula Rate for Transmission service will affect customers.

15. Refer to the Bradley testimony, page 7, lines 19–22, page 8, lines 1–2. Provide a detailed description as to what conditions may exist that could result in the moving of the switching station and how it might affect the other projects.

16. Refer to the Application, page 5, lines 12–14, and the Bradley Testimony page 7, lines 11–22, and page 8, 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 Certificate of Public Convenience and Necessity.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED FEB 28 2022

cc: Parties of Record

Case No. 2022-00012

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

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

*Senthia Santana
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