## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

I	ln	th	e	M	lat	ter	of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	CASE NO.
CLAUSE OF BIG RIVERS ELECTRIC	)	2022-00041
CORPORATION FROM MAY 1, 2021 THROUGH	)	
OCTOBER 31, 2021	)	

## 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 is due on May 18, 2022. 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 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

<sup>&</sup>lt;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).

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 3.
- a. Provide a status update on the Green Station conversion to natural gas.
- b. Explain whether the Green Station coal pile will be exhausted when the station is fully converted to natural gas. If not, explain the disposition of any remaining coal.

- 2. Refer to BREC's response to Staff's First Request, Item 4, page 2. Explain why BREC is willing to accept a higher level of SO2 in petroleum coke versus coal.
- 3. Refer to BREC's response to Staff's First Request, Item 5. Explain which contracts were for R. D. Green station and which were for D. B. Wilson Station.
  - 4. Refer to BREC's response to Staff's First Request, Item 15.
    - a. Explain the difference between a "Scheduled" and "Forced" Outage.
- b. Explain in detail how far in advance BREC plans its Scheduled Outages before taking the units offline.

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

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DATED <u>MAY 09 2022</u>

cc: Parties of Record

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