

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2023 INTEGRATED RESOURCE)	CASE NO.
PLAN OF BIG RIVERS ELECTRIC)	2023-00310
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, shall file with the Commission an electronic version of the following information. The information requested is due no later than June 21, 2024. 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 Joint Intervenors' First Request for Information, Item 9, Attachment (RFP Shortlisted Proposal Summary).

a. Identify what type of thermal resources were bid as included in the RFP Shortlisted Proposal Summary

b. Provide any documents reflecting evaluation of all-source RFP bids prior to passage of the Inflation Reduction Act.

2. Refer to Hearing Testimony (HVT) of Jason Burden, HVT at 11:09:42. Explain what additional maintenance would be needed if the hypothetical Green Station Natural Gas Combined Cycle (NGCC) unit was used consistently for energy generation as opposed to fulfilling MISO capacity obligations for the integrated resource planning period.

3. Refer to Hearing Testimony of Dr. Talina Matthews, HVT at 12:04:20. Provide a calculation of the estimated cost for carbon capture (\$4 billion) at Wilson Station and provide any documentation generated or relied upon in the calculation or decision-making process that BREC used to decide not to adopt potential carbon capture technology.

4. Refer to BREC's response to Commission Staff's First Request for Information, Item 9 Table, the IRP, Table 7.1.6(a) page 132 and confidential Table 7.4.1(a), page 152.

a. Confirm that the member peak CP used in IRP Table 7.1.6(a) is in part derived by subtracting the BREC CP to MISO CP Coincidence Factor used in the table provided in BREC's response to Staff's First Request, Item 9.

b. Explain whether the Base Case Member Peak from 7.1.6(a) in the table is the same peak used when calculating the figures in Table 7.4.1(a). If not, explain what data was used to construct the table. If yes, explain what effect including the BREC CP to MISO CP factor would have on capacity surplus or deficits.

5. Refer to Hearing Testimony of John Christensen, HVT at 09:35:27. Provide a calculation demonstrating how BREC set its desired level of capacity compared to

reserve margins and provide any documentation generated or relied upon in the calculation or decision-making process that BREC used to set capacity levels.

6. Refer to Hearing Testimony of John Christensen, HVT at 09:57:45.

a. Explain how capital environmental compliance costs were modeled for thermal resources. If there were multiple components to the capital costs, provide a breakdown of the individual components.

b. Explain what the model assumes as a proxy or proxies for future environment compliance capital costs. Provide any inputs or data related to these assumptions.

7. Refer to IRP confidential Table 7.3.2(a) page 146.

a. Explain why the capacity penalty for the NGCC is significantly lower than for Wilson Station.

b. Explain why the NGCC capital cost is significantly higher than for the Wilson station.



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

DATED MAY 31 2024

cc: Parties of Record

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Jody M Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Ashley Wilmes
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KENTUCKY 40602

*Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KENTUCKY 40507

*Nihal Shrinath
Sierra Club
2101
Webster St. , Suite 1300
Oakland, CALIFORNIA 94612

*Byron Gary
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KENTUCKY 40602

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Patrick Woolsey
Sierra Club
2101
Webster St. , Suite 1300
Oakland, CALIFORNIA 94612

*Evan Buckley
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*John Lavanga
Dinsmore & Shohl, LLP
City Center, 100 W. Main Street
Suite 900
Lexington, KENTUCKY 40507

*Big Rivers Electric Corporation
710 West 2nd Street
P. O. Box 20015
Owensboro, KY 42304

*Tom Fitzgerald
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KENTUCKY 40602

*Honorable Kerry E Ingle
Attorney at Law
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KENTUCKY 40202

*Senthia Santana
Big Rivers Electric Corporation
710 West 2nd Street
P. O. Box 20015
Owensboro, KY 42304

*Gregory B Ladd
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Edward T Depp
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Tyson Kamuf
Corporate Attorney
Big Rivers Electric Corporation
710 West 2nd Street
P. O. Box 20015
Owensboro, KY 42304