

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF BIG RIVERS ELECTRIC)	2024-00149
CORPORATION FROM MAY 1, 2023 THROUGH)	
OCTOBER 31, 2023)	

COMMISSION STAFF'S SECOND 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 on September 23, 2023. 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 Commission Staff's First Request for Information (Staff's First Request), Item 2, page 2 of 4. Explain the meaning of the option coal purchases versus the contract purchases.

2. Refer to BREC's response to Staff's First Request, Item 3.

- a. Explain how the Duration (In Days) category is calculated.

b. Explain why the Number of Days' Supply far exceeds the target inventory levels.

3. Refer to BREC's response to Staff's First Request, Item 7. Explain the cause of the Boardwalk Pipelines (Texas Gas Transportation) station outage and any actions that were taken to prevent future failures.

4. Refer to BREC's Response to Staff's First Request, Item 12. Explain whether the power purchase hedging activity for BREC Load is associated with the Kentucky Municipal Energy Agency and Owensboro Municipal Utilities contracts. If not, explain the reasons for the hedging activity.

5. Refer to BREC's response to Staff's First Request, Item 13, page 1.

a. Explain how lines 16 and 33 are related.

b. Explain how lines 27, 28, and 33 are related.

6. Refer to BREC's response to Staff's First Request, Item 13 and Item 23. For the industrial customer listed on line 29 for the months May 2023 through October 2023, there are no revenues listed under the Fuel Adjustment Clause (FAC) or Environmental Surcharge (ES) categories despite energy being consumed.

a. Explain why there are no revenues billed to that industrial customer.

b. Explain how the FAC and ES revenues associated with the energy consumed by that industrial customer were recovered.

7. Refer to BREC's response to Staff's First Request, Item 7 and Item 15, pages 2–3. Explain how BREC can have a scheduled maintenance outage at the exact same time Boardwalk Pipelines had a station outage.

8. Refer to BREC's response to Staff's First Request, Item 15 and Item 17. For each month that the two Green Station units have a zero percent gross capacity factor, provide the actual number of hours each unit generated power.

9. Explain whether BREC was subject to any MISO or FERC Performance penalties during the review period. If so, include an explanation as to why for each instance and the amount(s) of the penalties.



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DATED SEP 09 2024

cc: Parties of Record

Case No. 2024-00149

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