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 THIRD 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 October 28, 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 Commission Staff's First Request for Information (Staff's First Request), Item 22 and BREC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 6.
- a. Beginning from the service date of December 1, 2022, through the current review period, recalculate and provide the monthly Form A and Form B FAC filings including and accounting for the energy consumed by _____. Include in the response,

the monthly charge that BREC would have charged had it been included since December 1, 2022 along with the amount actually charged to the customers.

- b. Explain whether the omission of from the monthly FAC calculations affected the amounts charged to the retail customers of Meade County Rural Electric Cooperative Corporation, Kenergy Corporation, and Jackson Purchase Energy Corporation.
- c. For each month from December 1, 2022, through the current review period, provide the amount would have been charged, if the applicable FAC was applied during each period. Also, for each month from December 1, 2022, through the current review period, provide the amount of the difference between what all other customers were actually charged and what all other customers would have been charged due to the omission of share of fuel consumption in the FAC calculations. Break out the amounts of the differences for all other customers by each of BREC's distribution cooperatives.
- 2. Refer to BREC's response to Staff's Second Request, Item 7. Explain what maintenance activity was undertaken at the Sebree Station during the maintenance outage as a result of natural gas being unavailable.
- 3. Refer to BREC's response to Staff's Second Request, Item 9. Explain whether BREC will absorb the approximate \$645,000 disgorgement payment and a penalty as opposed to passing this amount on to its customers.

<u>Jidu & Shidurell</u> Linda C. Bridwell, PE

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED <u>OCT 10 2024</u>

cc: Parties of Record

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