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February 28, 2020

VIA HAND DELIVERY

Hon. Kent A. Chandler
Executive Director
Public Service Commission
211 Sower Boulevard, P.O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

FEB 28 2020

PUBLIC SERVICE
COMMISSION

Re: *In the Matter of: Big Rivers Electric Corporation's Annual Financial and Statistical Report Pursuant to Administrative Case No. 387 – A Review of the Adequacy of Kentucky's Generation Capacity and Transmission System*

Dear Mr. Chandler:

Enclosed for filing are an original and five (5) copies of Big Rivers Electric Corporation's supplemental information to its annual financial and statistical report required by the Public Service Commission's orders in Administrative Case No. 387. Also enclosed are an original and ten (10) copies of a motion for confidential treatment.

Please feel free to contact me should you have any questions regarding this filing.

Sincerely yours,

A handwritten signature in black ink, appearing to read "TK" or "Tyson Kamuf".

Tyson Kamuf
Corporate Attorney
tyson.kamuf@bigrivers.com

ORIGINAL



Your Touchstone Energy® Cooperative 

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FEB 28 2020

**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matters of:

A REVIEW OF THE ADEQUACY OF)	Administrative
KENTUCKY'S GENERATION CAPACITY)	Case No.
AND TRANSMISSION SYSTEM)	387

**SUPPLEMENTAL INFORMATION PROVIDED WITH
BIG RIVERS' ANNUAL FINANCIAL AND STATISTICAL REPORT
PURSUANT TO ADMINISTRATIVE CASE NO. 387**

FILED: February 28, 2020

ORIGINAL

FEB 28 2020

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY
PUBLIC SERVICE COMMISSION

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In the Matter of:

A REVIEW OF THE ADEQUACY OF)
KENTUCKY'S GENERATION CAPACITY) ADMINISTRATIVE
AND TRANSMISSION SYSTEM) CASE NO. 387

**MOTION OF BIG RIVERS ELECTRIC CORPORATION FOR
CONFIDENTIAL PROTECTION**

1. Big Rivers Electric Corporation ("Big Rivers") hereby petitions the Kentucky Public Service Commission ("Commission"), pursuant to 807 KAR 5:001 Section 13 and KRS 61.878, to grant confidential protection to portions of its responses to Items 8, 11, and 12, and to the attachment to its response to Item 14 of the supplemental information to Big Rivers' annual Financial and Statistical Report required by the Commission's orders in Administrative Case 387.

2. The information contained in the response to Items 8 and 14 that Big Rivers seeks to protect as confidential relates to Big Rivers' consideration of potential power supply additions. The confidential information in the response to Item 11 is a list of planned scheduled outages from 2020 through 2024. The confidential information in the attachment to Item 14 is a list of planned transmission system additions from 2020-2029. The information Big Rivers seeks to protect as confidential is hereinafter referred to as the "Confidential Information."

1 3. One (1) sealed copy of the responses to Items 8, 11, and 12 with the
2 Confidential Information highlighted with transparent ink is filed with this
3 petition. Ten (10) copies of those responses with the Confidential Information
4 redacted are also filed with this petition. 807 KAR 5:001 Section 13(2)(a)(3).

5 4. The entirety of the attachment to the response to Item 14 is
6 confidential. One (1) sealed copy of that attachment is filed with this petition. A
7 page noting that the attachment is filed under a petition for confidential treatment
8 is attached to the response to Item 14 filed with this petition. 807 KAR 5:001
9 Section 13(2)(a)(3)(b).

10 5. There are no other parties who are entitled to be served with a copy of
11 the petition or a copy of the redacted response. 807 KAR 5:001 Section 13(2)(b).

12 6. The Confidential Information is not publicly available, is not
13 disseminated within Big Rivers except to those employees and professionals with a
14 legitimate business need to know and act upon the information, and is not
15 disseminated to others without a legitimate need to know and act upon the
16 information.

17 7. If and to the extent the Confidential Information becomes generally
18 available to the public, whether through filings required by other agencies or
19 otherwise, Big Rivers will notify the Commission and have the information's
20 confidential status removed. 807 KAR 5:001 Section 13(10)(b).

21 8. As discussed below, the Confidential Information is entitled to
22 confidential protection based upon KRS 61.878(1)(c)(1), which protects "records

1 confidentially disclosed to an agency or required by an agency to be disclosed to it,
2 generally recognized as confidential or proprietary, which if openly disclosed would
3 permit an unfair commercial advantage to competitors of the entity that disclosed
4 the records.” KRS 61.878(1)(c)(1); 807 KAR 5:001 Section 13(2)(a)(1).

5 **I. Big Rivers Faces Actual Competition.**

6 9. Big Rivers, as a participant in the credit markets and the wholesale
7 power markets, faces economic competition from other entities.

8 10. Big Rivers competes in the wholesale power market to sell energy it
9 produces in excess of its members’ needs. Big Rivers’ ability to successfully compete
10 in the wholesale power market is dependent upon a combination of its ability to
11 negotiate the maximum price for the power sold and its ability to keep its cost of
12 production as low as possible. If Big Rivers’ cost of producing a kilowatt-hour of
13 energy increases, its ability to sell that kilowatt-hour in competition with other
14 utilities is adversely affected.

15 11. Big Rivers also competes for reasonably priced credit in the credit
16 markets, and its ability to compete is directly impacted by its financial results. Any
17 event that adversely affects Big Rivers’ margins will adversely affect its financial
18 results and potentially impact the price it pays for credit. As was described in the
19 proceeding before this Commission in the Big Rivers Unwind Transaction, Big
20 Rivers expects to be in the credit markets on a regular basis in the future.¹

¹ See *In the Matter of: Joint Application of Big Rivers, E.ON, LG&E Energy Marketing, Inc., and Western Kentucky Energy Corporation for Approval to Unwind Lease and Power Purchase Transactions*, Order, P.S.C. Case No. 2007-00455 (March 6, 2009), pages 27-30 and 37-39.

1 12. As is evidenced by these economic pressures, Big Rivers faces actual
2 competition from other market participants in the wholesale power and credit
3 markets.

4 **II. The Confidential Information is Generally Recognized as**
5 **Confidential or Proprietary.**
6

7 13. The Confidential Information for which Big Rivers seeks confidential
8 treatment under KRS 61.878(1)(c)(1) is generally recognized as confidential or
9 proprietary under Kentucky law. The Confidential Information consists of details
10 about potential power supply additions, a list of future scheduled outages, and a list
11 of planned transmission system additions.

12 14. Public disclosure of the Confidential Information will allow Big Rivers’
13 suppliers and competitors to know Big Rivers’ future power supply plans,
14 maintenance plans, and capital improvements. Information about a company’s
15 detailed inner workings is generally recognized as confidential or proprietary. *See,*
16 *e.g., Hoy v. Kentucky Indus. Revitalization Authority*, 907 S.W.2d 766, 768 (Ky.
17 1995) (“It does not take a degree in finance to recognize that such information
18 concerning the inner workings of a corporation is ‘generally recognized as
19 confidential or proprietary’”); *Marina Management Servs. v. Cabinet for Tourism,*
20 *Dep’t of Parks*, 906 S.W.2d 318, 319 (Ky. 1995) (unfair commercial advantage arises
21 simply from “the ability to ascertain the economic status of the entities without the
22 hurdles systemically associated with the acquisition of such information about
23 privately owned organizations”). Moreover, the Commission previously granted
24 confidential treatment to this type of information. *See, e.g., In the Matter of:*

1 *Electronic Application of Kentucky Power Company for (1) a General Adjustment of*
2 *its Rates for Electric Service; (2) an Order Approving its 2017 Environmental*
3 *Compliance Plan; (3) an Order Approving its Tariffs and Riders' (4) an Order*
4 *Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and*
5 *(5) an Order Granting all other Required Approvals and Relief, Order, P.S.C. Case*
6 *No. 2017-00179 (June 19, 2018) (granting confidential treatment to maintenance*
7 *and budget information that could be used to determine scope and timing of*
8 *planned maintenance outages); letter from the Commission dated July 20, 2010, in*
9 *Administrative Case No. 387 (granting confidential treatment to a list of future*
10 *scheduled outages that Big Rivers filed as part of the supplement to its annual*
11 *report).*

12 15. Accordingly, the information for which Big Rivers seeks confidential
13 treatment is recognized as confidential or proprietary under Kentucky law and is
14 entitled to confidential protection as further discussed below.

15 **III. Disclosure of the Confidential Information Would Permit an Unfair**
16 **Commercial Advantage to Big Rivers' Competitors.**

17
18 16. Disclosure of the Confidential Information would permit an unfair
19 commercial advantage to Big Rivers' competitors. As discussed above, Big Rivers
20 faces actual competition in the wholesale power market and in the credit market. It
21 is likely that Big Rivers would suffer competitive injury if that Confidential
22 Information was publicly disclosed, and the information should therefore be subject
23 to confidential treatment.

1 17. If the Confidential Information is publicly disclosed, Big Rivers’
2 competitors would have insight into when Big Rivers plans to add power supply
3 resources and when Big Rivers’ generation levels will drop due to maintenance and
4 thus know a crucial input into Big Rivers’ need for power and energy during those
5 periods. With that information, potential suppliers to Big Rivers will be able to
6 manipulate the price of power bid to Big Rivers in order to maximize their revenues,
7 and potential market power purchasers could use the information to know when
8 and to the extent Big Rivers is long on power and could use that information to
9 manipulate their bids, leading to lower revenues to Big Rivers. In P.S.C. Case No.
10 2003-00054, the Commission granted confidential protection to bids submitted to
11 Union Light, Heat & Power (“ULH&P”). ULH&P argued, and the Commission
12 implicitly accepted, that if the bids it received were publicly disclosed, contractors
13 on future work could use the bids as a benchmark, which would likely lead to the
14 submission of higher bids. *In the Matter of: Application of the Union Light, Heat
15 and Power Company for Confidential Treatment*, Order, P.S.C. Case No. 2003-00054
16 (August 4, 2003). The Commission also implicitly accepted ULH&P’s further
17 argument that the higher bids would lessen ULH&P’s ability to compete with other
18 gas suppliers. *Id.* Similarly, potential power suppliers or purchasers manipulating
19 Big Rivers’ bidding process would lead to higher costs or lower revenues to Big
20 Rivers and would place it at an unfair competitive disadvantage in the wholesale
21 power market and credit markets. Likewise, knowledge of future capital projects
22 would allow contractors and suppliers of materials for those projects to manipulate

1 their bids, leading to higher costs to Big Rivers and placing it at an unfair
2 competitive disadvantage in the wholesale power and credit markets.

3 18. Thus, public disclosure of the Confidential Information would permit
4 an unfair competitive advantage to Big Rivers' competitors.

5 IV. Time Period

6 19. Big Rivers requests that the Confidential Information remain
7 confidential until January 1, 2026, at which time the scheduled outages will have
8 passed and will no longer be confidential, and the information about planned power
9 supply resources and transmission projects will be sufficiently outdated so that it
10 could not be used to competitively disadvantage Big Rivers. 807 KAR 5:001 Section
11 13(2)(a)(2).

12 V. Conclusion

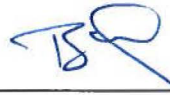
13 20. Based on the foregoing, the Confidential Information is entitled to
14 confidential protection. If the Commission disagrees that Big Rivers is entitled to
15 confidential protection, due process requires the Commission to hold an evidentiary
16 hearing. *See Utility Regulatory Comm'n v. Kentucky Water Serv. Co., Inc.*, 642
17 S.W.2d 591 (Ky. App. 1982).

18 WHEREFORE, Big Rivers respectfully requests that the Commission classify
19 and protect as confidential the Confidential Information.

20

1 On this the 28th day of February, 2020.

2 Respectfully submitted,

3
4 

5
6 _____
7 Tyson Kamuf
8 Corporate Attorney
9 Big Rivers Electric Corporation
10 201 Third Street
11 P.O. Box 24
12 Henderson, Kentucky 42419-0024
13 Phone: (270) 844-6185
14 Facsimile: (270) 844-6417
tyson.kamuf@bigrivers.com

BIG RIVERS ELECTRIC CORPORATION

**SUPPLEMENTAL INFORMATION PROVIDED WITH
BIG RIVERS' ANNUAL FINANCIAL AND STATISTICAL REPORT
PURSUANT TO ADMINISTRATIVE CASE NO. 387 –
A REVIEW OF THE ADEQUACY OF KENTUCKY'S GENERATION
CAPACITY AND TRANSMISSION SYSTEM**

**Response to Commission Staff's Information Request
as set forth in
Appendix G of the Commission's Order dated December 20, 2001**

February 28, 2020

1 **Item 1)** *Actual and weather-normalized energy sales for the just*
2 *completed calendar year. Sales should be disaggregated into native load*
3 *sales and off-system sales. Off-system sales should be further disaggregated*
4 *into full requirements sales, firm capacity sales, and non-firm or economy*
5 *energy sales. Off-system sales should be further disaggregated to identify*
6 *separately all sales where the utility acts as a reseller, or transporter, in a*
7 *power transaction between two or more other parties.*

8

9 **Response)** The information originally requested in the above item of Appendix G
10 of the Commission's Order dated December 20, 2001, in Administrative Case No.
11 387, ("the December 2001 Order in Admin. Case 387") is no longer required
12 pursuant to Ordering Paragraph No. 5 of the Commission's Order dated March 29,
13 2004, amending the December 2001 Order in Admin Case 387.

14

15 **Respondent)** Marlene S. Parsley

16

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1 **Item 2)** *A summary of monthly power purchases for the just completed*
2 *calendar year. Purchases should be disaggregated into firm capacity*
3 *purchases required to serve native load, economy energy purchases, and*
4 *purchases where the utility acts as a reseller, or transporter, in a power*
5 *transaction between two or more other parties.*

6

7 **Response)** The information originally requested in the above item of Appendix G
8 of the December 2001 Order in Admin. Case 387 is no longer required pursuant to
9 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
10 amending the December 2001 Order in Admin Case 387.

11

12

13 **Respondent)** Marlene S. Parsley

14

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February 28, 2020

- 1 **Item 3) *Actual and weather-normalized monthly coincident peak***
2 ***demands for the just completed calendar year. Demands should be***
3 ***disaggregated into***
4 ***a. native load demand (firm and non-firm) and***
5 ***b. off-system demand (firm and non-firm).***

6
7 **Response) Table 3-G shows the actual and weather normalized native load**
8 **demand and the off-system coincident demand for 2019. Native load is comprised**
9 **of the rural and industrial load of Big Rivers' Members. Big Rivers sells its power**
10 **into the Midcontinent Independent System Operator, Inc. ("MISO") market and,**
11 **therefore, the off-system sales cannot be weather normalized. Off-system demand**
12 **is comprised of three components: (i) forward bilateral sales which are characterized**
13 **as firm, (ii) sales to Nebraska customers which are served in the SPP market, and**
14 **(iii) off-system sales due to generation clearing in the MISO market which is in**
15 **excess of Big Rivers' load. These sales are not "non-firm," rather they are a result**
16 **of Big Rivers' compliance with MISO tariff obligations.**

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February 28, 2020

1

2 **Respondent)** Marlene S. Parsley

3

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February 28, 2020

1 **Item 4)** *Load shape curves that show actual peak demands and*
2 *weather-normalized peak demands (native load demand and total*
3 *demand) on a monthly basis for the just completed calendar year.*

4

5 **Response)** Graph 4-G shows the monthly native load demand with the monthly
6 weather normalized native load demand for 2019.

7

8

9 **Respondent)** Marlene S. Parsley

10

BIG RIVERS ELECTRIC CORPORATION

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**Response to Commission Staff's Information Request
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February 28, 2020

- 1 **Item 5)** *Load shape curves showing the number of hours that native*
2 *load demand exceeded these levels during the just complete calendar year:*
- 3 *a. 70% of the sum of installed generating capacity plus firm capacity*
4 *purchases;*
- 5 *b. 80% of the sum of installed generating capacity plus firm capacity*
6 *purchases;*
- 7 *c. 90% of the sum of installed generating capacity plus firm capacity*
8 *purchases.*

9

10 **Response)** The information originally requested in the above item of Appendix G
11 of the December 2001 Order in Admin. Case 387 is no longer required pursuant to
12 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
13 amending the December 2001 Order in Admin Case 387.

14

15 **Respondent)** Marlene S. Parsley

16

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1 **Item 6)** *Based on the most recent demand forecast, the base case*
2 *demand and energy forecasts and high case demand and energy forecasts*
3 *for the current year and the following four years. The information should*
4 *be disaggregated into*

5 *a. Native load (firm and non-firm demand) and*

6 *b. Off-system load (both firm and non-firm demand).*

7
8 **Response)** Table 6-G tabulates the forecasted base case and high case demand
9 and energy in the associated demand breakdowns as requested.

10

11

12 **Respondent)** Marlene S. Parsley

13

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February 28, 2020

1 **Item 7)** *The target reserve margin currently used for planning*
2 *purposes, stated as a percentage of demand. If changed from what was in*
3 *use in 2001, include a detailed explanation for the change.*

4
5 **Response)** The current target reserve margin used for planning purposes is 18.0%
6 based on Installed Capacity Ratings of resources, and 8.9% based on Unforced
7 Capacity Ratings, as specified by MISO for the upcoming planning year effective
8 June 1, 2020. MISO annually determines a minimum Planning Reserve Margin
9 ("PRM") that would result in the MISO system experiencing a less than one-day
10 loss-of-load event every 10 years per the MISO Tariff. That margin changes over
11 time, and is shown in the Table 5-3 reproduced below, which is from the MISO 2020-
12 2021 Loss of Load Expectation Study Report. That study includes details of how
13 that margin is derived and used and is available at the following link:

14

15 <https://cdn.misoenergy.org/2020%20LOLE%20Study%20Report397064.pdf>

16

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February 28, 2020

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Table 5.3: Future Planning Year MISO System Planning Reserve Margins ¹

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
ICAP (GW)	158.1	161.4	161.6	161.8	161.8	162.9	162.9	162.9	162.9	162.9
Demand (GW)	124.6	124.8	125.1	125.3	125.3	125.6	125.8	126.0	126.2	126.5
PRM_{ICAP}	<u>18.0%</u>	18.0%	17.9%	<u>17.9%</u>	18.2%	<u>18.2%</u>	18.1%	18.2%	18.2%	18.3%
PRM_{UCAP}	<u>8.9%</u>	8.9%	8.8%	<u>8.8%</u>	8.8%	<u>8.9%</u>	8.9%	8.9%	8.9%	8.9%

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4 **Respondent)** Marlene S. Parsley

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¹ Years without underlined results indicate PRM values that were calculated through interpolation.

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February 28, 2020

1 **Item 8)** *Projected reserve margins stated in megawatts and as a*
2 *percentage of demand for the current year and the following four years.*
3 *Identify projected deficits and current plans for addressing these. For each*
4 *year identify the level of firm capacity purchases projected to meet native*
5 *load demand.*

6
7 **Response)** Please see Table 1 on the following page. Reserve Margin MWs are
8 calculated as unforced capacity of available resources minus Base Demand and net
9 Firm Capacity Sales. Note this projection includes new industrial load beginning
10 in 2022. Big Rivers will make bilateral capacity purchases or participate in the
11 annual MISO Planning Resource Auction to alleviate any shortages so that we will
12 meet the MISO Planning Reserve Margin Requirements including transmission
13 losses. The anticipated purchase of [REDACTED] mentioned
14 in Item 12 of these responses is a portion of the Projected Purchases, below. Big
15 Rivers is not projecting any deficits. Coleman Station and Reid Station Unit 1 are

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1 excluded from reserve margin calculation due to anticipated retirements later this
2 year.

3

Table 1

Year	Reserve Margin (UCAP MW)	Reserve Margin (%)	MISO Reserve Margin Requirement ² (UCAP %)	Firm Capacity Purchases (MW) ³	Projected Purchases (MW)	Projected Deficit (MW)
2020	71	12 %	11.1 %	178		0
2021	72	11 %	11.1 %	178		0
2022	-28	-3 %	11.0 %	178		0
2023	12	1 %	11.0 %	178		0
2024	5	1 %	11.0 %	178		0

4

5

6 Respondent) Marlene S. Parsley

² MISO reserve margin Requirement includes transmission Losses.

³ Southeastern Power Administration ("SEPA") is at full 178 MW capacity for Planning Years 2020 and beyond following its return from Force Majeure status in January 2020.

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1 **Item 9)** *By date and hour, identify all incidents during the just*
2 *completed calendar year when reserve margin was less than the East*
3 *Central Area Reliability Council's ("ECAR") 1.5% spinning reserve*
4 *requirement. Include the amount of capacity resources that were available,*
5 *the actual demand on the system, and the reserve margin, stated in*
6 *megawatts and as a percentage of demand. Also, identify system conditions*
7 *at the time.*

8

9 **Response)** The information originally requested in the above item of Appendix G
10 of the December 2001 Order in Admin. Case 387 is no longer required pursuant to
11 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
12 amending the December 2001 Order in Admin Case 387.

13

14

15 **Respondent)** Marlene S. Parsley

16

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February 28, 2020

1 **Item 10)** *A list identifying and describing all forced outages in excess of*
2 *two hours in duration during the just completed calendar year.*

3

4 **Response)** The information originally requested in the above item of Appendix G
5 of the December 2001 Order in Admin. Case 387 is no longer required pursuant to
6 Ordering Paragraph No. 5 of the Commission's Order dated March 29, 2004,
7 amending the December 2001 Order in Admin Case 387.

8

9

10 **Respondent)** Ronald D. Gregory

11

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February 28, 2020

1 **Item 11)** *A list that identifies scheduled outages or retirements of*
2 *generating capacity during the current year and the following four years.*

3
4 **Response)** HMP&L Units 1 and 2 were retired on February 1, 2019 and,
5 consequently, there are no outage schedules provided for them. Coleman Units 1 –
6 3 were idled in May 2014, due to the Century Aluminum power sales contract
7 terminations and cessation of the MISO System Support Resource (“SSR”)
8 agreement applicable to the Coleman units. Big Rivers idled Reid Unit 1 on April
9 1, 2016, following MISO’s approval of Big Rivers’ Attachment Y Suspension Notice.
10 Big Rivers anticipates retiring the Coleman and Reid 1 units later this year. There
11 are no other retirements of generating capacity anticipated through 2024, at this
12 time.

13 The planned maintenance outage schedule for 2020 through 2024 is being
14 provided pursuant to a Motion for Confidential Treatment. The schedule is
15 regularly modified based on actual operating conditions, forced outages, changes in
16 the schedule required to meet environmental regulation compliance, fluctuation in

BIG RIVERS ELECTRIC CORPORATION

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A REVIEW OF THE ADEQUACY OF KENTUCKY'S GENERATION
CAPACITY AND TRANSMISSION SYSTEM**

**Response to Commission Staff's Information Request
as set forth in
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February 28, 2020

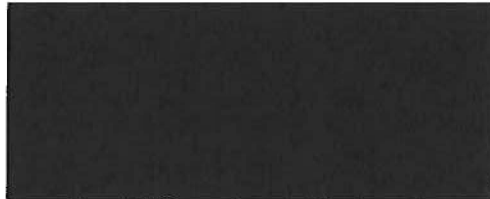
1 wholesale capacity and energy prices, and other unforeseen events that may affect
2 unit reliability or generation capacity. The scheduled outages for all units are listed
3 in the tables which follow.

4

5

Wilson Unit 1

2020
2021
2022
2023
2024

A large black rectangular redaction box covers the data for Wilson Unit 1 for the years 2020 through 2024.

6

7

Green Unit 1

2020
2021
2022
2023
2024

A large black rectangular redaction box covers the data for Green Unit 1 for the years 2020 through 2024.

8

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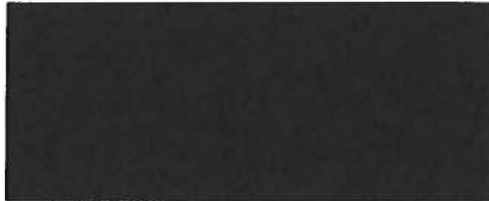
February 28, 2020

1

2

Green Unit 2

2020
2021
2022
2023
2024



3

4

Coleman Unit 1

2020
2021
2022
2023
2024



5

6

Coleman Unit 2

2020
2021
2022
2023
2024



7

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1

2

Coleman Unit 3

2020
2021
2022
2023
2024



3

4

Reid Unit 1

2020
2021
2022
2023
2024



5

6

Reid Combustion Turbine

2020
2021
2022
2023
2024



7

8

Respondent) Ronald D. Gregory

9

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1 **Item 12)** *Identify all planned base load or peaking capacity additions to*
2 *meet native load requirements over the next 10 years. Show the expected in-*
3 *service date, size, and site for all planned additions. Include additions*
4 *planned by the utility, as well as those by affiliates, if constructed in*
5 *Kentucky or intended to meet load in Kentucky.*

6

7 **Response)** At this time, Big Rivers anticipates purchasing at least [REDACTED]
8 [REDACTED] in [REDACTED] to partially meet base load requirements of
9 additional industrial load coming on line in 2022. Big Rivers is also evaluating the
10 economics of adding [REDACTED].

11

12

13 **Respondent)** Marlene S. Parsley

14

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1 **Item 13)** *The following transmission energy data for the just completed*
2 *calendar year and the forecast for the current year and the following four*
3 *years:*

4
5 **a.** *Total energy received from all interconnections and generation*
6 *sources connected to the transmission system;*

7 **b.** *Total energy delivered to all interconnections on the transmission*
8 *system;*

9 **c.** *Peak load capacity of the transmission system; and*

10 **d.** *Peak demand for summer and winter seasons on the transmission*
11 *system.*

12

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1 **Response)**

2 a.

Transmission System Energy Received (MWh)

	<u>Generation</u>	<u>Interconnections</u>	<u>Total</u>
2019	4,977,978	12,089,995	17,067,973

Projected System Energy Received (MWh)

2020	17,600,000
2021	18,000,000
2022	18,000,000
2023	18,000,000
2024	18,000,000

3

4 b.

Transmission System Energy Delivered at Interconnections
(MWh)

	<u>Total</u>
2019	7,428,604

Projected System Energy Delivered at Interconnection
(MWh)

2020	7,310,000
2021	7,310,000
2022	7,310,000
2023	7,310,000
2024	7,310,000

5

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1 c.

Transmission Peak Capacity (MW)

2019 2,903

Projected Transmission Peak Capacity (MW)

2020 2,903

2021 2,903

2022 2,903

2023 2,903

2024 2,903

2

3 d.

Transmission System Peak Demand (MW)

	<u>Winter</u>	<u>Summer</u>
2019	1,512	1,324

Projected System Peak Demand (MW)

	<u>Winter</u>	<u>Summer</u>
2020	1,604	1,623
2021	1,608	1,625
2022	1,611	1,628
2023	1,614	1,630
2024	1,616	1,632

4

5 Respondent) Christopher S. Bradley

6

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1 **Item 14)** *Identify all planned transmission capacity additions for the*
2 *next ten years. Include the expected in-service date, size and site for all*
3 *planned additions and identify the transmission need each addition is*
4 *intended to address.*

5

6 **Response)** A **CONFIDENTIAL** listing of Big Rivers' planned Transmission
7 Capacity Additions for 2020 through 2029 is being submitted with a Motion for
8 Confidential Treatment.

9

10

11 **Respondent)** Christopher S. Bradley

12

In the Matter of:

A REVIEW OF THE ADEQUACY OF) Administrative
KENTUCKY'S GENERATION CAPACITY) Case No.
AND TRANSMISSION SYSTEM) 387

SUPPLEMENTAL INFORMATION PROVIDED WITH
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CONFIDENTIAL RESPONSE

to Item 14 of the Commission Staff's Information Request
as set forth in Appendix G of the Commission's Order
dated December 20, 2001
FILED: February 28, 2020

**INFORMATION SUBMITTED WITH A
MOTION FOR CONFIDENTIAL TREATMENT**

BIG RIVERS ELECTRIC CORPORATION

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1 **Supplemental Item 1) *Provide a detailed discussion of the consideration***
2 ***given to price elasticity in the forecasted demand, energy, and reserve***
3 ***margin information above.***

4

5 **Response) This supplemental information, originally requested pursuant to a**
6 **May 31, 2013, letter request from Commission Staff, is no longer required pursuant**
7 **to a January 13, 2017, letter from the Commission's Executive Director.**

8

9

10 **Respondent) Marlene S. Parsley**

11