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ATTORNEYS AT LAW

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MAR 28 2013

PUBLIC SERVICE
COMMISSION

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Jesse T. Mountjoy
Frank Stainback
James M. Miller
Michael A. Fiorella
Allen W. Holbrook
R. Michael Sullivan
Bryan R. Reynolds*
Tyson A. Kamuf
Mark W. Starnes
C. Ellsworth Mountjoy

March 28, 2013

Mr. Jeff Derouen
Executive Director
Public Service Commission of Kentucky
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0615

*Also Licensed in Indiana

*In The Matter Of: Application of Big Rivers Electric Corporation For A
General Adjustment In Rates - Case No. 2012-00535*

Dear Mr. Derouen:

Enclosed for filing are an original and ten (10) copies of (i) the response of Big Rivers Electric Corporation to the Public Service Commission Staff's Third Request for Information and the intervenors' second requests for information; (ii) a petition for confidential treatment for certain of the responses; and (iii) a Motion for Deviation.

Copies of the responses, the petition, and the motion have been served on those parties listed on the attached service list by Federal express or hand delivery.

Sincerely,



Tyson Kamuf

cc: Service List
Billie J. Richert

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PSC Case No. 2012-00535

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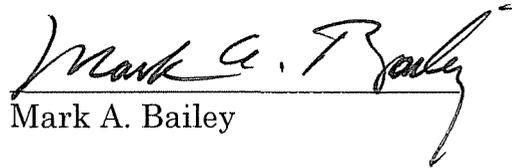
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Neal B. Hayes
Kircher Suetholz & Grayson PSC
515 Park Avenue
Louisville, KY 40208
Counsel for IBEW Local 1701

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

VERIFICATION

I, Mark A. Bailey, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Mark A. Bailey

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

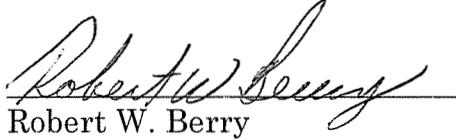
SUBSCRIBED AND SWORN TO before me by Mark A. Bailey on this
the 25th day of March, 2013.


Notary Public, Ky. State at Large
My Commission Expires 1-12-17

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535

VERIFICATION

I, Robert W. Berry, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Robert W. Berry

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Robert W. Berry on this
the 22 day of March, 2013.


Notary Public, Ky. State at Large
My Commission Expires _____

Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

VERIFICATION

I, Billie J. Richert, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Billie J. Richert

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Billie J. Richert on this
the 22 day of March, 2013.


Notary Public, Ky/State at Large
My Commission Expires _____

Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

VERIFICATION

I, Lindsay N. Barron, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Lindsay N. Barron

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Lindsay N. Barron on
this the 22 day of March, 2013.


Notary Public, Ky. State at Large
My Commission Expires _____

Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

VERIFICATION

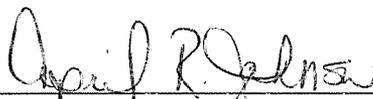
I, David G. Crockett, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



David G. Crockett

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by David G. Crockett on this
the 22nd day of March, 2013.



Notary Public, Ky. State at Large
My Commission Expires 8-9-2014

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535

VERIFICATION

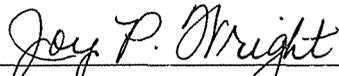
I, James V. Haner, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



James V. Haner

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by James V. Haner on this
the 22 day of March, 2013.



Notary Public, Ky. State at Large
My Commission Expires _____

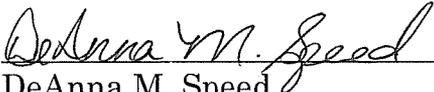
Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

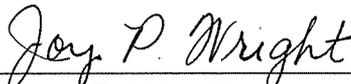
VERIFICATION

I, DeAnna M. Speed, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


DeAnna M. Speed

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by DeAnna M. Speed on this
the 25 day of March, 2013.


Notary Public, Ky. State at Large
My Commission Expires _____

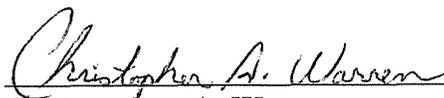
Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

VERIFICATION

I, Christopher A. Warren, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Christopher A. Warren

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Christopher A. Warren
on this the 25 day of March, 2013.


Notary Public, Ky. State at Large
My Commission Expires _____

Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

VERIFICATION

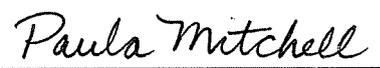
I, John Wolfram, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



John Wolfram

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by John Wolfram on this the 22nd day of March, 2013.



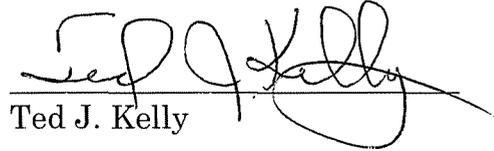
Notary Public, Ky. State at Large
My Commission Expires 1-12-17

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

VERIFICATION

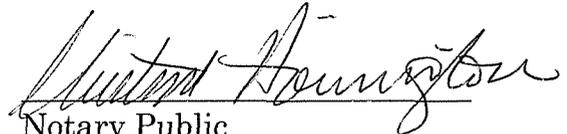
I, Ted J. Kelly, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Ted J. Kelly

STATE OF MISSOURI)
COUNTY OF JACKSON)

SUBSCRIBED AND SWORN TO before me by Ted J. Kelly on this the 22 day of March, 2013.




Notary Public
State of Missouri
My Commission Expires 9/25/13

ORIGINAL



Your Touchstone Energy[®] Cooperative 

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

APPLICATION OF BIG RIVERS)
ELECTRIC CORPORATION FOR A) **Case No. 2012-00535**
GENERAL ADJUSTMENT IN RATES)

**Response to Commission Staff's
Third Request for Information
dated March 14, 2013**

FILED: March 28, 2013

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535

**Response to the Commission Staff's Third Request
for Information dated March 14, 2013**

March 28, 2013

1 *Item 1) Refer to Big Rivers' response to Item 4 of Commission Staffs Second Information*
2 *Request ("Staffs Second Request"), which includes its base period showing the actual*
3 *results of operations through January 2013. Provide an update of the base period with*
4 *actual results through February 2013. Consider this an ongoing request to which updates*
5 *with actual results for the final two months of the base period should be provided by the*
6 *end of the following calendar month.*

7

8 **Response)** Attached is the updated base-period statement of operations which includes ten
9 months of actual data (May 2012 through February 2013) and two months of estimated data
10 (March 2013 through April 2013).

11

12 **Witness)** Billie J. Richert

Big Rivers Electric Corporation
Case No. 2012-00535

Attachment for Response to PSC 3-1
Base Period with Adjustments to Forecast Period

| Line Item | May-2012 Actuals | Jun-2012 Actuals |
|--|---------------------|---------------------|
| Electric Energy Revenues | 48,310 | 46,967 |
| Other Operating Revenue and Income | 380 | 503 |
| Total Oper Revenues & Patronage Capital | 48,690 | 47,470 |
| Operation Expense-Production-excl fuel | 4,063 | 3,967 |
| Operation Expense-Production-Fuel | 20,412 | 19,401 |
| Operation Expense-Other Power Supply | 8,773 | 7,966 |
| Operation Expense-Transmission | 1,080 | 633 |
| Operation Expense - RTO/ISO | 195 | 180 |
| Operation Expense - Customer Accounts | 0 | 0 |
| Consumer Service & Informational Expense | 22 | 47 |
| Operation Expense - Sales | 5 | 10 |
| Operation Expense - Administrative & General | 1,923 | 3,270 |
| Total Operation Expense | 36,473 | 35,474 |
| Maintenance Expense-Production | 2,627 | 2,679 |
| Maintenance Expense-Transmission | 391 | 539 |
| Maintenance Expense-General Plant | 21 | 25 |
| Total Maintenance Expense | 3,039 | 3,243 |
| Depreciation & Amortization Expense | 3,392 | 3,392 |
| Taxes | 0 | 0 |
| Enterest on Long-Term Debt | 3,815 | 3,706 |
| Interest Charged to Construction-Credit | (65) | (57) |
| Other Interest Expense | 0 | 0 |
| Other Deductions | 27 | 12 |
| Total Cost of Electric Service | 46,681 | 45,770 |
| Operating Margins | 2,009 | 1,700 |
| Interest Income | 4 | 4 |
| Allowance for Funds Used during Const | 0 | 0 |
| Other Non-Operating Income - net | 0 | 0 |
| Other Capital Credits & Pat Dividends | 0 | 0 |
| Extraordinary Items | 0 | 0 |
| Net Patronage Capital or Margins | 2,013 | 1,704 |

Big Rivers Electric Corporation
Case No. 2012-00535

Attachment for Response to PSC 3-1
Base Period with Adjustments to Forecast Period

| Line Item | Jul-2012 Actuals | Aug-2012 Actuals |
|--|---------------------|---------------------|
| Electric Energy Revenues | 50,686 | 48,521 |
| Other Operating Revenue and Income | 567 | 532 |
| Total Oper Revenues & Patronage Capital | 51,253 | 49,053 |
| Operation Expense-Production-excl fuel | 4,185 | 4,332 |
| Operation Expense-Production-Fuel | 21,590 | 19,183 |
| Operation Expense-Other Power Supply | 8,667 | 8,465 |
| Operation Expense-Transmission | 954 | 805 |
| Operation Expense - RTO/ISO | 139 | 128 |
| Operation Expense - Customer Accounts | 0 | 0 |
| Consumer Service & Informational Expense | 90 | 41 |
| Operation Expense - Sales | 5 | 72 |
| Operation Expense - Administrative & General | 2,004 | 2,474 |
| Total Operation Expense | 37,634 | 35,500 |
| Maintenance Expense-Production | 3,350 | 4,096 |
| Maintenance Expense-Transmission | 450 | 614 |
| Maintenance Expense-General Plant | 1 | 17 |
| Total Maintenance Expense | 3,801 | 4,727 |
| Depreciation & Amortization Expense | 3,404 | 3,521 |
| Taxes | 0 | 0 |
| Interest on Long-Term Debt | 3,680 | 3,851 |
| Interest Charged to Construction-Credit | (59) | (65) |
| Other Interest Expense | 11 | 44 |
| Other Deductions | 15 | 26 |
| Total Cost of Electric Service | 48,486 | 47,604 |
| Operating Margins | 2,767 | 1,449 |
| Interest Income | 6 | 19 |
| Allowance for Funds Used during Const | 0 | 0 |
| Other Non-Operating Income - net | 0 | 0 |
| Other Capital Credits & Pat Dividends | 0 | 14 |
| Extraordinary Items | 0 | 0 |
| Net Patronage Capital or Margins | 2,773 | 1,482 |

Big Rivers Electric Corporation
Case No. 2012-00535

Attachment for Response to PSC 3-1
Base Period with Adjustments to Forecast Period

| Line Item | Sep-2012 Actuals | Oct-2012 Actuals |
|--|---------------------|---------------------|
| Electric Energy Revenues | 46,264 | 46,001 |
| Other Operating Revenue and Income | 351 | 409 |
| Total Oper Revenues & Patronage Capital | 46,615 | 46,410 |
| Operation Expense-Production-excl fuel | 4,038 | 3,682 |
| Operation Expense-Production-Fuel | 18,170 | 18,171 |
| Operation Expense-Other Power Supply | 8,973 | 10,860 |
| Operation Expense-Transmission | 626 | 903 |
| Operation Expense - RTO/ISO | 170 | 191 |
| Operation Expense - Customer Accounts | 0 | 0 |
| Consumer Service & Informational Expense | 61 | 96 |
| Operation Expense - Sales | 5 | 39 |
| Operation Expense - Administrative & General | 2,107 | 1,331 |
| Total Operation Expense | 34,150 | 35,273 |
| Maintenance Expense-Production | 3,000 | 3,761 |
| Maintenance Expense-Transmission | 338 | 333 |
| Maintenance Expense-General Plant | 17 | 14 |
| Total Maintenance Expense | 3,355 | 4,108 |
| Depreciation & Amortization Expense | 3,564 | 3,396 |
| Taxes | 0 | 0 |
| Enterest on Long-Term Debt | 3,704 | 3,809 |
| Interest Charged to Construction-Credit | (70) | (70) |
| Other Interest Expense | 0 | 0 |
| Other Deductions | 24 | 71 |
| Total Cost of Electric Service | 44,727 | 46,587 |
| Operating Margins | 1,888 | (177) |
| Interest Income | 348 | 174 |
| Allowance for Funds Used during Const | 0 | 0 |
| Other Non-Operating Income - net | 0 | 0 |
| Other Capital Credits & Pat Dividends | 0 | 0 |
| Extraordinary Items | 0 | 0 |
| Net Patronage Capital or Margins | 2,236 | (3) |

Big Rivers Electric Corporation
Case No. 2012-00535

Attachment for Response to PSC 3-1
Base Period with Adjustments to Forecast Period

| Line Item | Nov-2012 Actuals | Dec-2012 Actuals | Jan-2013 Actual |
|--|---------------------|---------------------|--------------------|
| Electric Energy Revenues | 50,276 | 47,926 | 50,638 |
| Other Operating Revenue and Income | 328 | 361 | 362 |
| Total Oper Revenues & Patronage Capital | 50,604 | 48,287 | 51,000 |
| Operation Expense-Production-excl fuel | 4,036 | 3,943 | 4,375 |
| Operation Expense-Production-Fuel | 21,116 | 21,249 | 21,531 |
| Operation Expense-Other Power Supply | 7,679 | 8,646 | 9,328 |
| Operation Expense-Transmission | 818 | 1,035 | 771 |
| Operation Expense - RTO/ISO | 215 | 193 | 238 |
| Operation Expense - Customer Accounts | 0 | 297 | 0 |
| Consumer Service & Informational Expense | 144 | 256 | 48 |
| Operation Expense - Sales | 5 | 45 | 0 |
| Operation Expense - Administrative & General | 2,098 | 2,622 | 1,751 |
| Total Operation Expense | 36,111 | 38,286 | 38,042 |
| Maintenance Expense-Production | 3,252 | 3,285 | 3,304 |
| Maintenance Expense-Transmission | 237 | 302 | 279 |
| Maintenance Expense-General Plant | 11 | 31 | 23 |
| Total Maintenance Expense | 3,500 | 3,618 | 3,606 |
| Depreciation & Amortization Expense | 3,417 | 3,426 | 3,414 |
| Taxes | 0 | 0 | 0 |
| Enterest on Long-Term Debt | 3,706 | 3,799 | 3,804 |
| Interest Charged to Construction-Credit | (74) | (45) | (34) |
| Other Interest Expense | 46 | 47 | 0 |
| Other Deductions | 167 | 121 | 35 |
| Total Cost of Electric Service | 46,873 | 49,252 | 48,867 |
| Operating Margins | 3,731 | (965) | 2,133 |
| Interest Income | 172 | 214 | 169 |
| Allowance for Funds Used during Const | 0 | 0 | 0 |
| Other Non-Operating Income - net | 0 | 0 | 0 |
| Other Capital Credits & Pat Dividends | 0 | 3 | 0 |
| Extraordinary Items | 0 | 0 | 0 |
| Net Patronage Capital or Margins | 3,903 | (748) | 2,302 |

Big Rivers Electric Corporation
Case No. 2012-00535

Attachment for Response to PSC 3-1
Base Period with Adjustments to Forecast Period

| | Feb-2013 | Mar-2013 | Apr-2013 |
|--|---------------|----------|----------|
| Line Item | Actual | Budget | Budget |
| Electric Energy Revenues | 49,227 | | |
| Other Operating Revenue and Income | 350 | 307 | 308 |
| Total Oper Revenues & Patronage Capital | 49,577 | | |
| Operation Expense-Production-excl fuel | 4,112 | | |
| Operation Expense-Production-Fuel | 19,894 | | |
| Operation Expense-Other Power Supply | 7,940 | | |
| Operation Expense-Transmission | 1,167 | | |
| Operation Expense - RTO/ISO | 216 | | |
| Operation Expense - Customer Accounts | 0 | | |
| Consumer Service & Informational Expense | 23 | | |
| Operation Expense - Sales | 5 | | |
| Operation Expense - Administrative & General | 2,636 | | |
| Total Operation Expense | 35,993 | | |
| Maintenance Expense-Production | 2,631 | | |
| Maintenance Expense-Transmission | 336 | | |
| Maintenance Expense-General Plant | 35 | | |
| Total Maintenance Expense | 3,002 | | |
| Depreciation & Amortization Expense | 3,414 | 3,446 | 3,451 |
| Taxes | 0 | 0 | 1 |
| Enterest on Long-Term Debt | 3,496 | 3,929 | 3,836 |
| Interest Charged to Construction-Credit | (36) | (22) | (46) |
| Other Interest Expense | 0 | 0 | 0 |
| Other Deductions | 70 | 47 | 45 |
| Total Cost of Electric Service | 45,939 | | |
| Operating Margins | 3,638 | | |
| Interest Income | 165 | 170 | 168 |
| Allowance for Funds Used during Const | 0 | 0 | 0 |
| Other Non-Operating Income - net | 0 | 0 | 0 |
| Other Capital Credits & Pat Dividends | 0 | 1,238 | 25 |
| Extraordinary Items | 0 | 0 | 0 |
| Net Patronage Capital or Margins | 3,803 | | |

**Big Rivers Electric Corporation
Case No. 2012-00535**

**Attachment for Response to PSC 3-1
Base Period with Adjustments to Forecast Period**

| Line Item | Base Period | Adjustments | Forecasted Period Budget |
|--|-------------|-------------|--------------------------------|
| Electric Energy Revenues | | | |
| Other Operating Revenue and Income | 4,758 | (1,062) | 3,696 |
| Total Oper Revenues & Patronage Capital | | | |
| Operation Expense-Production-excl fuel | | | |
| Operation Expense-Production-Fuel | | | |
| Operation Expense-Other Power Supply | | | |
| Operation Expense-Transmission | | | |
| Operation Expense - RTO/ISO | | | |
| Operation Expense - Customer Accounts | | | |
| Consumer Service & Informational Expense | | | |
| Operation Expense - Sales | | | |
| Operation Expense - Administrative & General | | | |
| Total Operation Expense | | | |
| Maintenance Expense-Production | | | |
| Maintenance Expense-Transmission | | | |
| Maintenance Expense-General Plant | | | |
| Total Maintenance Expense | | | |
| Depreciation & Amortization Expense | 41,237 | 2,866 | 44,103 |
| Taxes | 1 | 0 | 1 |
| Enterest on Long-Term Debt | 45,135 | 1,848 | 46,983 |
| Interest Charged to Construction-Credit | (643) | (1,837) | (2,480) |
| Other Interest Expense | 148 | (148) | 0 |
| Other Deductions | 660 | (69) | 591 |
| Total Cost of Electric Service | | | |
| Operating Margins | | | |
| Interest Income | 1,613 | 363 | 1,976 |
| Allowance for Funds Used during Const | 0 | 0 | 0 |
| Other Non-Operating Income - net | 0 | 0 | 0 |
| Other Capital Credits & Pat Dividends | 1,280 | 1,426 | 2,706 |
| Extraordinary Items | 0 | 0 | 0 |
| Net Patronage Capital or Margins | | | |

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535

**Response to the Commission Staff's Third Request
for Information dated March 14, 2013**

March 28, 2013

1 *Item 2) Refer to the attachment to Big Rivers' response to Item 9 of Staff's Second*
2 *Request. Provide the average \$/MWh price Big Rivers has realized on off-system sales*
3 *during January and February of 2013.*

4

5 **Response)** January 2013 

6 February 2013 

7

8 **Witness)** Billie J. Richert

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

**Response to Commission Staff's Third Request
for Information dated March 14, 2013**

March 28, 2013

1 **Item 3)** *Refer to the attachment to Big Rivers' response to Item 17 of Staffs Second*
2 *Request, which provides a comparison of amounts budgeted for construction projects and*
3 *the actual costs of construction projects for the years 2010, 2011, and 2012. Provide, in the*
4 *same format as in the attachment, a breakdown of these budgeted and actual amounts*
5 *between environmental and non-environmental projects.*

6

7 **Response)** Big Rivers has discovered that in answering PSC 2-17, it erroneously utilized
8 data from PSC 1-13a, which did not include capital construction projects that had been
9 budgeted but not yet started. The attachment to this response corrects that error and now
10 includes all budgeted capital construction projects broken down by budgeted and actual
11 amounts between environmental and non-environmental projects.

12

13 **Witness)** Robert W. Berry

**Big Rivers Electric Corporation
Case No. 2012-00535**

**Non-environmental and Environmental Construction Projects
Budget vs. Actual for 2010 - 2012**

| Years | Annual Actual Cost | Annual Original Budget | Variance in Dollars |
|-------------------------------|-------------------------------|-----------------------------------|----------------------------|
| 2012 Total | \$ 39,803,729 | \$ 83,304,729 | \$ 43,501,000 |
| 2012 Non Environmental | \$ 37,941,189 | \$ 67,231,897 | \$ 29,290,708 |
| 2012 Environmental | \$ 1,862,540 | \$ 16,072,832 | \$ 14,210,292 |
| 2011 Total | \$ 38,400,544 | \$ 53,049,152 | \$ 14,648,608 |
| 2011 Non Environmental | \$ 35,057,352 | \$ 49,038,777 | \$ 13,981,425 |
| 2011 Environmental | \$ 3,343,192 | \$ 4,010,375 | \$ 667,183 |
| 2010 Total | \$ 44,505,172 | \$ 45,605,157 | \$ 1,099,985 |
| 2010 Non Environmental | \$ 41,332,213 | \$ 41,162,872 | \$ (169,341) |
| 2010 Environmental | \$ 3,172,959 | \$ 4,442,285 | \$ 1,269,326 |

Note(s) -

Total all projects for a given year.
Excludes City's Share

BIG RIVERS ELECTRIC CORPORATION

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March 28, 2013

1 *Item 4) Refer to Big Rivers' response to Item 18 of Staff's Second Request, page 8 of 10,*
2 *which refers to several potential customers Big Rivers may have an interest in serving and*
3 *includes the size of the load of one such customer. Provide the size of the loads of the four*
4 *largest potential customers other than the one already identified.*

5

6 **Response)** [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14

15 **Witness)** Robert W. Berry

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
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1 *Item 5) Refer to the Requests for Proposals ("RFP") attached to the response to Item 18*
2 *of Staff's Second Request. On page 26 of 28 of the response, the RFP of Louisville Gas*
3 *and Electric Company and Kentucky Utilities Company ("LG&E/KU") indicates the*
4 *evaluation was to be completed by March 15, 2013. State whether Big Rivers has received*
5 *notice of whether it is continuing to be considered by LG&E/KU.*

6

7 **Response)** [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12

13 **Witness) Robert W. Berry**

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
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1 *Item 6) Refer to Big Rivers' response to Item 21 of Staff's Second Request, page 4 of 7.*
2 *Lines 11-12 indicate that Big Rivers anticipated receiving results from the Midwest*
3 *Independent System Operator ("Midwest ISO") to the Attachment Y-2 request it submitted*
4 *on December 19, 2012, "in early to mid-March." If they have been received, provide the*
5 *Midwest ISO results along with a narrative description thereof. If they have not been*
6 *received, state when Big Rivers expects to receive the results.*

7

8 **Response)** Big Rivers has not received the attachment Y-2 results from MISO. Results were
9 anticipated by March 15, but per MISO's March 18 email, MISO has indicated results should
10 be available by the end of March.

11

12 **Witness)** Robert W. Berry

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
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March 28, 2013

1 **Item 7)** *Refer to Big Rivers' response to Item 36 of Staff's Second Request. Exhibit*
2 *Wolfram-5.2 in the response is a three-page exhibit while Exhibit Wolfram-5 in the*
3 *application is a four-page exhibit. Provide the fourth page of Exhibit Wolfram-5.2.*

4

5 **Response)** Exhibit Wolfram-5.2 is three pages by design; there is no fourth page. Exhibit
6 Wolfram-5.2 has one less page than Exhibit Wolfram-5 because of changes to Note C, which
7 describes the modeling of the Environmental Surcharge. In Exhibit Wolfram-5, Note C
8 described an estimation of Total Adjusted Revenues for each rate class. In Exhibit Wolfram-
9 5.2, Note C was simplified to explain that ES amounts were taken directly from the Big
10 Rivers Financial Model, as described in the response to PSC 2-40 part (a)(3). The shorter
11 explanation in Note C allowed the exhibit to fit on three pages instead of four.

12

13 **Witness)** John Wolfram

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

**Response to Commission Staff's Third Request
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March 28, 2013

1 **Item 8)** *Refer to Big Rivers' response to Item 24.c. of Kentucky Industrial Utility*
2 *Customers, Inc.'s ("KIUC") First Information Request ("KIUC's First Request"), page 12*
3 *of the Direct Testimony of Travis A. Siewert and Exhibit Siewert-3. Identify what amount,*
4 *if any, of interest costs on the financing for the \$60 million in pollution-control equipment*
5 *Big Rivers plans to install in 2013 and 2014 is included in the \$46,983,291 in interest on*
6 *long-term debt in the proposed test period.*

7

8 **Response)** \$1,155,332 of interest costs on the financing for the pollution-control equipment
9 Big Rivers plans to install in 2013 and 2014 is included in the total interest expense on long-
10 term debt of \$46,983,291 included in the proposed test period of September 2013 through
11 August 2014 as shown in Exhibit Siewert-3.

12 The \$1,155,332 in interest costs will not be included in base rates. During the test
13 period, these interest costs are fully offset by a capitalized interest credit. Recovery of
14 interest expense on ECP projects will occur through the Environmental Surcharge
15 mechanism.

16

17 **Witness)** Billie J. Richert

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

**Response to Commission Staff's Third Request
for Information dated March 14, 2013**

March 28, 2013

1 *Item 9) Refer to page 2 of 18 of the attachment to Big Rivers' response to Item*
2 *25.a. of KIUC's First Request. If it has been finalized and submitted to the Rural Utilities*
3 *Service ("RUS"), provide the corrective plan mentioned in the last sentence of the letter*
4 *from Billie J. Richert to the RUS Administrator.*

5

6 **Response)** A copy of Big Rivers' Corrective Plan to Achieve Two Credit Ratings of
7 Investment Grade (the "Corrective Plan"), submitted to the RUS on March 7, 2013, is
8 provided as an attachment to this response. Appendices A and B to the Corrective Plan
9 include CONFIDENTIAL information and are being provided as separate attachments with a
10 petition for confidential treatment.

11

12 **Witness)** Billie J. Richert



Your Touchstone Energy® Cooperative 

Corrective Plan to Achieve Two Credit Ratings of Investment Grade

March 7, 2013

[Please note that Appendices A and B to this document contain **CONFIDENTIAL COMMERCIAL BUSINESS INFORMATION** relating to details of ongoing negotiations of credit documents and potential business transactions, the public disclosure of which would be highly prejudicial and damaging to Big Rivers Electric Corporation's commercial business interests.]

**Big Rivers Electric Corporation
Corrective Plan to Achieve Two Credit Ratings of Investment Grade
March 7, 2013**

Contractual Covenant: Maintenance of Two Credit Ratings of Investment Grade

If Big Rivers fails to maintain two Credit Ratings of Investment Grade per Section 4.23 – Maintenance of Credit Ratings of the Amended and Consolidated Loan Contract dated as of July 16, 2009 (the Agreement) between Big Rivers Electric Corporation (Big Rivers) and United States of America acting by and through the Administrator of the Rural Utilities Service (RUS), Big Rivers must notify RUS in writing to that effect within five (5) days after becoming aware of such failure.

Big Rivers became aware of this failure to maintain two Credit Ratings of Investment Grade when Fitch Ratings downgraded its rating from BBB- to BB on February 6, 2013. Standard & Poor's previously downgraded Big Rivers from BBB- to BB- on February 4, 2013. Big Rivers notified RUS in writing on February 7, 2013 pursuant to Section 4.23 (b) of the Agreement.

In addition, pursuant to Section 4.23 (c) of the Agreement, within thirty (30) days of the date on which Big Rivers fails to maintain two Credit Ratings of Investment Grade, Big Rivers in consultation with the RUS shall provide a written plan satisfactory to the RUS setting forth the actions that shall be taken that are reasonably expected to achieve two Credit Ratings of Investment Grade. This document is submitted by Big Rivers to the RUS as a proposed written plan that is expected to be satisfactory to the RUS as is required under Section 4.23 (c).

Background

On August 20, 2012, Century Aluminum Company (Century) gave its one year contract termination notice to Kenergy Corp. and Big Rivers Electric Corporation. This notice indicated Century is ceasing all smelter operations at their Hawesville, Kentucky facility on August 20, 2013. Century is the source of approximately thirty-six (36%) of Big Rivers' wholesale revenues or approximately \$205 million for the twelve months ending December 31, 2012.

On January 31, 2013, Alcan Primary Products Corporation (Alcan) gave its one year contract termination notice to Kenergy Corp. and Big Rivers. This notice indicated Alcan is ceasing all smelter operations at their Sebree smelter located in Robards, Kentucky on January 31, 2014. Alcan is the source of approximately twenty-eight (28%) of Big Rivers' wholesale revenues or approximately \$155 million for the twelve months ending December 31, 2012.

As a result of Big Rivers receiving Alcan's notice of termination, all three rating agencies, Fitch Ratings (on February 6, 2013), Standard & Poor's (on February 4, 2013) and Moody's Investors Service (on February 6, 2013), downgraded the credit ratings on Big Rivers' \$83.3 million County of Ohio, KY's Pollution Control Refunding Revenue Bonds, Series 2010A. In addition, Standard & Poor's downgraded

Big Rivers Electric Corporation
Corrective Plan to Achieve Two Credit Ratings of Investment Grade
March 7, 2013

its long term rating on Big Rivers. All three bond ratings are now below investment grade as shown in the following table:

Big Rivers' Current Credit Ratings

| Moody's | S&P | Fitch | |
|---------|------|-------|-------------------------|
| Aaa | AAA | AAA | Investment Grade |
| Aa1 | AA+ | AA+ | |
| Aa2 | AA | AA | |
| Aa3 | AA- | AA- | |
| A1 | A+ | A+ | |
| A2 | A | A | |
| A3 | A- | A- | |
| Baa1 | BBB+ | BBB+ | |
| Baa2 | BBB | BBB | |
| Baa3 | BBB- | BBB- | |
| Ba1 | BB+ | BB+ | Non-Investment Grade |
| Ba2 | BB | BB | |
| Ba3 | BB- | BB- | |
| B1 | B+ | B+ | |
| B2 | B | B | |
| B3 | B- | B- | |

= Big Rivers' credit ratings as of 2/6/2013

**Big Rivers Electric Corporation
Corrective Plan to Achieve Two Credit Ratings of Investment Grade
March 7, 2013**

Rating Agencies' Focus

Rating agencies focus on three areas of Big Rivers' business when issuing ratings on Big Rivers' \$83.8m County of Ohio, Kentucky, Pollution Control Refunding Revenue Bonds. Primarily these three areas are:

- 1) Access to and maintenance of liquidity
- 2) Replacement load for Big Rivers' two largest customers who have given notice of termination, and
- 3) Increased Big Rivers' activity in off-system sales market

As part of Big Rivers' corrective plan to achieve two investment grade credit ratings Big Rivers' addresses each of these areas in this document.

Access to and Maintain Liquidity

Lines of Credit

Big Rivers has two \$50 million lines of credit, one with CoBank, ACB, expiring July 2017, and the other with National Rural Utilities Cooperative Finance Corporation (CFC) that expires July 2014.

CFC Line of Credit

Under the current arrangement, the CFC line of credit will become unavailable to Big Rivers on August 20, 2013 upon the termination of a smelter wholesale agreement and this event is an Event of Default under Section 6.01 M of that facility.

Big Rivers and CFC have completed negotiations on a Term Sheet for the CFC line of credit with the major modifications that are listed on the attached **CONFIDENTIAL** Appendix A.

CoBank Line of Credit

Presently, Big Rivers is unable to make the representations and warranties necessary to draw on the CoBank line of credit as a result of Kenergy receiving the Notice of Termination from Century. Upon the termination of the Century retail agreement which occurs on August 20, 2013, there is an Event of Default which terminates CoBank's commitment to lend and accelerates payments. A default under this agreement can cause a default under the CoBank Secured Loan Agreement.

**Big Rivers Electric Corporation
Corrective Plan to Achieve Two Credit Ratings of Investment Grade
March 7, 2013**

Big Rivers intends to restart negotiations with CoBank to attempt to restructure this line later in March 2013.

Environmental Compliance Plan for Mercury and Air Toxics Standards (MATS) Financing

Big Rivers plans to submit an application to RUS to obtain long-term financing for its MATS Environmental Compliance Plan. In the interim, Big Rivers will obtain short-term financing from the National Rural Utilities Cooperative Finance Corporation (CFC). This short-term or bridge financing will be in the form of a \$60 million senior secured three-year credit facility. Big Rivers has received a Term Sheet from CFC which reflects the terms and conditions Big Rivers has negotiated with CFC. As requested by RUS, we are submitting a copy to RUS of this Term Sheet.

Big Rivers is updating its RUS application for long-term financing to reflect results of a revised load forecast based upon both Century and Alcan going to market and no longer buying their power from Big Rivers.

CFC requires submission of the RUS application prior to finalizing the short-term MATS financing. As such, Big Rivers is planning to submit its application to RUS by mid-April and file a financing application with the PSC for the CFC interim financing shortly thereafter.

Rate Case 2012-00535 – Century

On January 15, 2013, Big Rivers filed a general rate case with the PSC as a result of Century's contract termination, continued depressed off system sales margins, increased depreciation expense, and other costs not fully recovered in the 2011 general rate case. The total annual revenue deficiency, \$74,476,120, is calculated as the annual incremental revenue needed to permit Big Rivers to achieve a 1.24 TIER during the fully forecasted test year (September 2013 – August 2014) while also achieving Margin for Interest Ratio (MFIR) of 1.10 in calendar year 2013. This total annual revenue deficiency represents a 21% wholesale revenue increase; 29% for the rurals; 18% for the large industrials; and 16% for the remaining smelter, Alcan. These rate increases would go into effect August 20, 2013.

**Big Rivers Electric Corporation
Corrective Plan to Achieve Two Credit Ratings of Investment Grade
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Rate Case 2013-XXXXX – Alcan

Big Rivers has begun plans to file another general rate case in late June 2013 to address the annual revenue deficiency resulting from Alcan's contract termination. These rate increases would go into effect January 31, 2014.

\$58.8 Million PCB Financing Case 2012-00492

On January 13, 2013, Big Rivers amended its application in the \$58.8 million PCB financing case. The reason for amending this application is to seek PSC approval to repurpose the \$60 million borrowed for capital expenditures from CoBank in 2012 to pay-off the \$58.8 million pollution control bonds due June 1, 2013, and to use the \$35 million Transition Reserve to pay for capital expenditures. Although it was Big Rivers' original intent to refund these bonds, it was determined market receptivity was minimal due to the uncertainty surrounding Big Rivers and the results of the two smelters giving notices of termination. By paying off these bonds, Big Rivers will realize an annual net cost savings of approximately \$3.4 million in interest expense and issuance costs. The amendment filed in this financing case is intended also to preserve the capability of Big Rivers to issue, in part, tax-exempt pollution control bonds sometime in the future.

A hearing was held in Frankfort, Kentucky on February 28th, 2013. No briefs are being filed. Big Rivers is hopeful that the PSC will issue an order by March 31, 2013.

Replacement Load and Addressing Reliance on Off-System Sales

Load Concentration Mitigation Plan Activities Update

The **CONFIDENTIAL** Big Rivers Load Concentration Mitigation Plan Activities Update is attached as **CONFIDENTIAL** Appendix B.

**Big Rivers Electric Corporation
Corrective Plan to Achieve Two Credit Ratings of Investment Grade
March 7, 2013**

SUMMARY

Big Rivers is confident it can regain two investment grade ratings with the rate relief from the PSC along with the successful implementation of its Load Concentration Mitigation Plan and following the pay down of the \$58.8 million PCB issue due June 1, 2013. Big Rivers' believes completion of the entire process will most likely take three to four years. Big Rivers financial metrics are good; it continues to meet all of the financial debt covenants associated with both long-term and short-term debt; and our projections for the 2013 – 2016 timeframe reflect ongoing compliance. We are ready to work closely with the RUS in developing a corrective plan which is acceptable to the RUS and to ensure Big Rivers achieves two credit ratings of investment grade within a reasonable period of time.

**Big Rivers Electric Corporation
Corrective Plan to Achieve Two Credit Ratings of Investment
Grade
March 7, 2013**

CONFIDENTIAL APPENDIX A

The principal terms on the term sheet to amend the CFC revolving line of credit agreement are:

- 1) The line of credit will become secured under the indenture.
- 2) The maturity date will be extended to July 16, 2017.

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIAL

The PSC 3-9 attachment 3 of 3 has been omitted from the public filing. It has been provided under a petition for confidential treatment.

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**Response to Commission Staff's Third Request
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1 **Item 10) Refer to Big Rivers' response to Item 36.c. of KIUC's First Request. Provide Big**
2 **Rivers' estimate of the annual reduction in variable operating costs it would realize if it**
3 **were to idle the Coleman Generating Station.**

4

5 **Response)** Please see the table below providing Big Rivers' estimate of the annual reduction
6 in variable costs if the Coleman Generating Station were idled.

| COLEMAN STATION VARIABLE (FUEL & VOM) COSTS | | | |
|--|----------------|--------------|-----------------|
| Year | Running | Idled | Variance |
| 2014 | | | |
| 2015 | | | |
| 2016 | | | |
| Annual Average | | | |

7

8 **Witness) Robert W. Berry**

BIG RIVERS ELECTRIC CORPORATION

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March 28, 2013

1 **Item 11)** *Refer to Big Rivers' response to Item 53.c. of KIUC's First Request.*
2 *Confirm that the requirement for interest income on the Transition Reserve to be adjusted*
3 *out of the contract Times Interest Earned Ratio calculation is a requirement of Section*
4 *4.7.5(f) of the Smelter Agreements and no other agreement or document.*

5

6 **Response)** Confirmed.

7

8 **Witnesses)** Billie J. Richert

9 John Wolfram

BIG RIVERS ELECTRIC CORPORATION

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March 28, 2013

1 **Item 12)** *Refer to the response to Item 7 of Alcan Primary Products Corporation's First*
2 *Request for Information. Provide a general description of how, upon completion of the*
3 *"TVA Paradise" switchyard upgrade project, Big Rivers will be able to export all the*
4 *smelter power. Include in the description, at minimum, the specific interconnects over*
5 *which the power could be transferred, the export of each interconnect, and the specific*
6 *utilities to which the power could be transmitted.*

7

8 **Response)** Upon the completion by TVA of the Paradise switchyard upgrade project, Big
9 Rivers will have completed all six of the transmission system upgrades identified as Phase 2
10 Transmission Projects in my Direct Testimony. The Phase 2 Transmission Projects include
11 the addition of a new 13 mile 161 kV line and substation line terminal, upgrades to existing
12 internal transmission line facilities, and an upgrade to our existing interconnection with
13 Hoosier Energy Corporation. With all of these improvements complete, Big Rivers will be
14 able to export all excess power, including the smelter power, using the various
15 interconnection facilities identified in the attached table. The export transfer capability
16 improvements have been quantified in both a study performed by the Big Rivers' planning
17 staff (refer to AG 1-19 response) and a study performed by the MISO planning staff (refer to
18 PSC 2-24 response). Both of these studies confirmed that sufficient interconnection
19 transmission capacity exists to export the smelter power without overloading any
20 transmission facility. The specific interconnections over which the power could be
21 transferred are identified in the attached table. Each facility rating, and the specific utility or
22 RTO to which the power could be transmitted are also shown.

23

24 **Witness)** David G. Crockett

**Big Rivers Electric Corporation
Case No. 2012-00535**

**Attachment to Response for PSC 3-12
Interconnection Ratings
Effective March 19th, 2013**

| Interconnections | | | Bus Voltage (kV) | Tie to | Summer Max (MVA) | Winter Max (MVA) |
|--------------------------|----|-------------|-----------------------------|---------------|-----------------------------|---------------------------------|
| LG&E/KU | | | | | | |
| Coleman EHV | to | Daviess EHV | 345 | KU | 717 | 717 |
| Wilson | to | Daviess EHV | 345 | KU | 956 | 956 |
| Wilson | to | Green River | 161 | KU | 530 | 558 |
| Hardinsburg | to | Hardinsburg | 138 | KU | 187 | 191 |
| Hardinsburg | to | Cloverport | 138 | LG&E | 187 | 191 |
| LG&E/KU Total | | | | | <u>2,577</u> | <u>2,613</u> |
| MISO | | | | | | |
| Reid EHV | to | A.B.Brown | 345 | Vectren | 1,327 | 1,585 |
| Henderson Co. | to | A.B.Brown | 138 | Vectren | 224 | 224 |
| Vectren Total | | | | | <u>1,551</u> | <u>1,809</u> |
| Livingston | to | Renshaw | 161 | SIPC | 203 | 203 |
| Morganfield | to | Gallatin | 69 | SIPC | 36 | 42 |
| SIPC Total | | | | | <u>239</u> | <u>245</u> |
| Coleman | to | Newtonville | 161 | HE | 335 | 335 |
| HE Total | | | | | <u>335</u> | <u>335</u> |
| MISO Total | | | | | <u>2,125</u> | <u>2,389</u> |
| TVA | | | | | | |
| Bryan Rd | to | Marshall | 161 | TVA | 265 | 335 |
| Wilson/Hardinsburg Tap | to | Paradise | 161 | TVA | 446 | 446 |
| Hopkins Co. | to | Barkley | 161 | TVA | 265 | 335 |
| Livingston Co. | to | Barkley | 161 | TVA | 223 | 223 |
| Barkley | to | Lyon Co. | 69 | TVA | 39 | 39 |
| Livingston Co. | to | Marshall | 161 | TVA | 223 | 223 |
| McCracken Co. | to | Tap L | 161 | TVA | 335 | 335 |
| TVA Total | | | | | <u>1,796</u> | <u>1,936</u> |
| BREC Total | | | | | <u>6,498</u> | <u>6,938</u> |

BIG RIVERS ELECTRIC CORPORATION

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March 28, 2013

1 *Item 13) Refer to Big Rivers' response to Item 58 of the Attorney General's ("AG") First*
2 *Request for Information ("AG's First Request"), page 3 of 3. Provide the smelter rates in*
3 *July of 2009, at the time of the Unwind Transaction, and in August 2012, at the time of*
4 *Century Aluminum's termination notice expressed in dollars per megawatt-hour.*

5

6 **Response)** The smelter wholesale rates in July, 2009 at the time of the Unwind Transaction
7 were \$48.80 per MWh for Century and \$43.35 per MWh for Alcan.

8 The smelter wholesale rates in the month of August, 2012 at the time of Century
9 Aluminum's termination notice were \$49.26 per MWh for Century and \$50.14 per MWh for
10 Alcan.

11

12 **Witness) Robert W. Berry**

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
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CASE NO. 2012-00535**

**Response to Commission Staff's Third Request
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March 28, 2013

1 **Item 14)** *Refer to Big Rivers' response to Item 89 of the AG's First Request, page 24 of 24.*
2 *In comparing projected retail rural rates of its members with retail rural rates of other*
3 *utilities, state whether the "rural" rates of the other utilities reflect those utilities' retail*
4 *residential rates. If not residential rates, identify what rates are reflected.*

5

6 **Response)** Yes. The "rural" rates of the other utilities reflect those utilities' retail residential
7 rates.

8

9 **Witness)** Robert W. Berry

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

**Response to Commission Staff's Third Request
for Information dated March 14, 2013**

March 28, 2013

1 **Item 15)** *Refer to the attachment to Big Rivers' response to Item 104 of the AG's First*
2 *Request. Of the non-environmental production construction projects budgeted for 2013*
3 *and 2014, provide the total dollar amount the projects Big Rivers expects will be completed*
4 *by the end of the test year in this proceeding.*

5

6 **Response)** The total dollar amount budgeted for Big Rivers' non-environmental production
7 construction projects in 2013 and 2014 is [REDACTED]. Of that amount Big Rivers expects
8 that [REDACTED] will be completed by the end of the test year in this proceeding.

9

10 **Witness)** Robert W. Berry

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2012-00535**

**Response to Commission Staff's Third Request
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March 28, 2013

1 **Item 16) Refer to Big River's response to Item 107.e. of the AG's First Request. Provide a**
2 **breakdown, by year and by cost category, of the estimate of approximately \$72.6 million in**
3 **fixed costs savings to its members of idling the Wilson Station during the 2014-2016**
4 **timeframe.**

5

6 **Response)** Please see the attachment for the requested breakdown of approximately \$72.6
7 million in fixed cost savings which would result from idling the Wilson Station from 2014
8 through 2016.

9

10 **Witness) Robert W. Berry**

**Big Rivers Electric Corporation
Case No. 2012-00535**

**Attachment to Response for PSC 3-16
Fixed Cost Savings Related to Idling Wilson Station**

| WILSON STATION FIXED COSTS | | | | | | | | |
|----------------------------|---------|-------|---------|-------|---------|-------|-----------------|-------|
| Cost Category | 2014 | | 2015 | | 2016 | | 2014-2016 Total | |
| | Running | Idled | Running | Idled | Running | Idled | Running | Idled |
| Non-Labor Non-Outage | | | | | | | | |
| Non-Labor Outage | | | | | | | | |
| Labor | | | | | | | | |
| Total Fixed Costs | | | | | | | | |
| Fixed Cost Savings | | | | | | | | |

Case No. 2012-00535

Attachment to Response for PSC 3-16

Witness: Robert W. Berry

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