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February 28, 2013

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

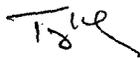
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*In The Matter Of: An Examination of the Application of Fuel Adjustment
Clause of Big Rivers Electric Corporation from November 1,
2010 through October 31, 2012, Case No. 2012-00555*

Dear Mr. DeRouen:

Enclosed for filing on behalf of Big Rivers Electric Corporation ("Big Rivers") are an original and ten (10) copies of (i) Big Rivers' responses to the information requested in Appendix A of the Public Service Commission's February 13, 2013, order in the above-referenced matter; and (ii) a petition for confidential treatment.

Sincerely,



Tyson Kamuf

cc: Service List
Billie J. Richert

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ORIGINAL



Your Touchstone Energy® Cooperative 

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

AN EXAMINATION OF THE APPLICATION)	
OF THE FUEL ADJUSTMENT CLAUSE)	
OF BIG RIVERS ELECTRIC CORPORATION)	Case No.
FROM)	2012-00555
NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012)	

DIRECT TESTIMONY

OF

**LINDSAY N. BARRON
VICE PRESIDENT, ENERGY SERVICES**

ON BEHALF OF

BIG RIVERS ELECTRIC CORPORATION

FILED: FEBRUARY 28, 2013

ORIGINAL

1
2
3
4
**DIRECT TESTIMONY
OF
LINDSAY N. BARRON**

5 **Q. Please state your name, business address, and position.**

6 A. My name is Lindsay N. Barron. I am employed by Big Rivers Electric
7 Corporation (“Big Rivers”), 201 Third Street, Henderson, Kentucky 42420,
8 as Vice President, Energy Services.

9
10 **Q. Please describe your job responsibilities.**

11 A. As Vice President, Energy Services, I am responsible for the strategic
12 management and oversight of all activities associated with the Energy
13 Services department. I oversee a staff of five individuals who work to
14 provide value to Big Rivers and its Members through power portfolio
15 optimization, Midwest Independent Transmission System Operator, Inc.
16 (“MISO”) market participation, load forecasting, resource planning, natural
17 gas purchases, demand side management and energy efficiency program
18 management, and member economic development support.

19
20 **Q. Briefly describe your education and work experience.**

21 A. I first joined Big Rivers in October 1998 in the Accounting Department. I
22 held various roles in Accounting/Purchasing before transitioning to Power
23 Supply in March of 2003 as Economic Analyst/Market Coordinator. I joined

1 Vectren Corporation as an Energy Market Analyst in 2005 and served as
2 Manager, Market Research & Analysis for Vectren from December 2006 to
3 August 2010. I returned to Big Rivers as Director of Risk Management &
4 Strategic Planning in September 2010, and assumed responsibility for
5 Energy Services in June 2012. I am a Certified Public Accountant and
6 earned a Master of Business Administration degree and a Bachelor of
7 Science in Accounting from the University of Southern Indiana.

8

9 **Q. Have you previously testified before this Commission?**

10 A. Yes. In Big Rivers' pending General Rate Case (Case No. 2012-00535) I
11 filed direct testimony, and I have prepared, and will prepare, data
12 responses in that proceeding. I have also prepared data responses in other
13 cases on behalf of Big Rivers.

14

15 **Q. What is the purpose of your testimony in this proceeding?**

16 A. The purpose of my testimony is to describe changes in the wholesale electric
17 power market and their effect on Big Rivers' electric power procurement
18 practices. I also briefly discuss Big Rivers' natural gas procurement
19 activities.

20

21 **Q. Please describe any changes in the wholesale electric power**
22 **market that occurred during the Review Period or that Big Rivers**

1 **expects to occur within the next two years that have significantly**
2 **affected or will significantly affect Big Rivers' electric power**
3 **procurement practices.**

4 A. During the past two years wholesale electric power market prices have been
5 declining and continue to remain depressed primarily due to the weakened
6 economy and abundance of natural gas. This has allowed Big Rivers to
7 make more economic purchases for its Members in off-peak hours; however,
8 the decline in wholesale market prices has greatly reduced the income Big
9 Rivers realizes from off-system sales of its excess energy.

10 Pending and existing Environmental Protection Agency ("EPA")
11 regulations may significantly affect wholesale electric power market prices.
12 Big Rivers believes coal generating units that are not in compliance with
13 MATS standards, and not working to come into compliance, will likely be
14 coming offline by April 2015. While some regulated utilities have chosen to
15 build combined cycle gas generation to replace those generating units, most
16 merchant companies will likely decommission their coal plants and not
17 replace that supply. This decline in supply could place upward pressure on
18 wholesale market prices. Also, national economic turnaround and/or an
19 increased cost of natural gas would likely drive the wholesale price of power
20 higher. Any increases in energy market prices, whether driven by supply or
21 demand drivers, will decrease Big Rivers' ability to make economic
22 purchases for its Members in the off-peak hours; however, it will allow Big

1 Rivers' generators to "clear the market" more often, thus resulting in
2 increased off-system sales. While market prices are low, Big Rivers will
3 continue to work to optimize economic purchases for its Members. As
4 market prices rise, Big Rivers will continue to strive to increase its off-
5 system sales to the market to provide value to its Members.

6
7 **Q. Have Big Rivers' electric power procurement practices during the**
8 **Review Period been reasonable?**

9 A. Yes. Big Rivers always seeks to procure the lowest cost reliable power in
10 the most cost effective manner while limiting financial and operational
11 risks to the company, complying with applicable state laws, federal laws,
12 transmission constraints, and reliability standards.

13
14 **Q. Has Big Rivers experienced any problems during the Review**
15 **Period with natural gas procurement?**

16 A. No.

17
18 **Q. Have Big Rivers' fuel procurement purchases and practices for**
19 **natural gas during the Review Period been reasonable?**

20 A. Yes. Big Rivers makes spot purchases of natural gas, as needed, to ensure
21 an adequate supply of fuel to provide for Members load, system reliability,
22 and/or off-system sales.

1

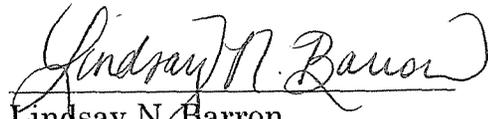
2 **Q. Does this conclude your testimony?**

3 **A. Yes.**

BIG RIVERS ELECTRIC CORPORATION
AN EXAMINATION OF THE APPLICATION
OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

VERIFICATION

I, Lindsay N. Barron, verify, state, and affirm that I prepared or supervised the preparation of my testimony and responses to data requests filed with this Verification, and that testimony and those 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 25th day of February, 2013.


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

ORIGINAL



Your Touchstone Energy® Cooperative 

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

AN EXAMINATION OF THE APPLICATION)	
OF THE FUEL ADJUSTMENT CLAUSE)	
OF BIG RIVERS ELECTRIC CORPORATION)	Case No.
FROM)	2012-00555
NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012)	

DIRECT TESTIMONY

OF

**MARK W. McADAMS
DIRECTOR, FUELS PROCUREMENT**

ON BEHALF OF

BIG RIVERS ELECTRIC CORPORATION

FILED: FEBRUARY 28, 2013

ORIGINAL

1 **Q. Please summarize your duties at Big Rivers.**

2 A. I am responsible for Big Rivers' procurement of solid fuel, fuel oil, flue-gas
3 desulphurization bulk reagent (lime and limestone), and related
4 transportation for the delivery of the foregoing materials

5

6 **Q. Have you previously testified before this Commission?**

7 A. Yes. During my tenure with LG&E I testified in LG&E's fuel reviews.
8 During my time at Big Rivers, I have testified in Big Rivers six-month fuel
9 adjustment clause ("FAC") reviews [six-months ending April 30, 2010 (Case
10 No. 2010-00269), six-months ending April 30, 2011 (Case No. 2011-00250),
11 six-months ending October 31, 2011 (Case No. 2011-00487), and six-months
12 ending April 30, 2012 (Case No. 2012-00323). I also testified in Big Rivers'
13 last two-year FAC review (Case No. 2010-00495). Finally, I have also
14 prepared and filed data responses in these FAC review cases and in other
15 cases on behalf of Big Rivers.

16

17 **Q. What is the purpose of your testimony in this proceeding?**

18 A. The purpose of my testimony is to describe Big Rivers' procurement
19 practices for fuel as they relate to the FAC for the period from November 1,
20 2010, through October 31, 2012 (the "Review Period").

21

1 **Q. Have Big Rivers' coal suppliers adhered to their contract delivery**
2 **schedules during the Review Period?**

3 A. The majority of coal supply contracts are compliant with schedules that
4 were established during the time frame of the Review Period. During the
5 review period, Big Rivers received a force majeure notice from PBP Energy,
6 LLC (a coal fines reclamation contract) due to an operating permit.
7 Following the inability to obtain such permit and delay in resumption of
8 shipments, Big Rivers exercised its contractual rights to terminate the
9 contract. Also during the review period, Coal Network, Inc. and Rust of
10 Kentucky were unable to obtain surface mining permits and the contract
11 terminated March 31, 2012 without delivery. In both examples, given the
12 lower tonnage volume, spot coal was procured near or below the pricing of
13 the terminated agreements.

14 From time-to-time, there are various impediments to delivery
15 (weather, river-related matters of flooding and/or drought, equipment
16 break-down, etc.) that the parties manage in order to deliver the product at
17 a later date, via alternate mode of transportation, or carry-forward into the
18 subsequent month or quarter to complete delivery. Such make-up of
19 delayed tonnage is based upon the contractual language of the coal supply
20 agreement and the reason for delay (i.e., force majeure). For example,
21 Patriot Coal Sales had various delays during the course of 2011 which

1 constituted a 108,000 ton shortfall of lower priced coal supply which was
2 carried forward into 2012 for delivery.

3
4 **Q. What efforts has Big Rivers made in general to help ensure coal**
5 **suppliers' adherence to contract delivery schedules during the**
6 **review period?**

7 A. Big Rivers reviews its delivery schedules with suppliers and its generating
8 station contacts on a daily basis to ensure that scheduled tonnage has been
9 completed over the term of the contractual agreement. In the event of delay
10 (mining and/or logistics issues), the parties agree upon revised schedules to
11 ensure completion of contractual tonnage amounts. In the event of force
12 majeure, the non-declaring party has a contractual option as to whether to
13 reschedule any shortfall tonnage. Contractual documents for coal supply
14 denote that time is of the essence in regard to coal delivery. Big Rivers has
15 not had a situation where it needed to invoke contract language regarding
16 delinquent or missed shipments, as yet, following resumption of operation
17 of the generating units. In such an event, the supplier would be provided
18 notice of shortfall or non-delivery pursuant to the contractual agreement
19 and would be obligated to remedy such default or face the potential
20 termination of the agreement.

21
22

1 **Q. What efforts has Big Rivers made to maintain the adequacy of its**
2 **coal supplies in light of any coal suppliers inability or**
3 **unwillingness to make coal contract deliveries?**

4 A. As discussed above, Big Rivers obtained spot coal to make up for lower
5 tonnage volume under two contracts due to permitting issues. Big Rivers
6 strives to enforce its contractual agreements. Big Rivers also reviews its
7 inventory situation and from time-to-time issues spot solicitations should
8 inventory levels fall outside of targeted ranges due to contractual
9 shortfall(s), incremental generation above budgeted plans, or force majeure
10 situations which delay planned shipments.

11
12 **Q. Please describe any changes in coal market conditions that**
13 **occurred during the Review Period or that Big Rivers expects to**
14 **occur within the next two years that have significantly affected or**
15 **will significantly affect Big Rivers' solid fuel procurement**
16 **practices.**

17 A. As a result of international coal demand, coal normally retained within the
18 United States, particularly the Illinois Basin coal supply, has started to
19 move into the export market for international sale. Also, in light of
20 impending emissions regulations, many utility companies that formerly
21 utilized lower sulfur coal have now or are in the process of installing flue
22 gas desulphurization equipment ("scrubbers") and are moving their

1 procurement of fuel from the Central Appalachian region to the higher
2 sulfur Illinois Basin. Shale gas extraction, economic recession, and forward
3 environmental pressures have caused coal inventories at many utilities to
4 increase, creating an overall flat to decreasing market for coal pricing and
5 demand. Coal producers have taken steps to reduce existing production
6 and delay or forego intended expansion of either existing or new mining
7 reserves. Utilities are starting to utilize some of the incremental inventory
8 built during the period of the past year to year and a half during the period
9 of low natural gas prices and the recession.

10 Over the period in review, and in the near term, Big River's fuel
11 procurement practices have not been adversely impacted. However, the
12 potential change of these various market pressures could bring about firmer
13 pricing. Big Rivers will continue to actively survey the marketplace for
14 opportunities to secure its fuel supply for short and long-term business,
15 weighing these market forces while making procurement decisions.

16
17 **Q. Have Big Rivers' fuel procurement purchases and practices for**
18 **solid fuel during the Review Period been reasonable?**

19 **A.** Yes. Big Rivers' practices have included spot, mid, and long-term fuel and
20 logistics procurement, in a concerted and planned fashion, to attempt to
21 limit its exposure to volatility in the marketplace and to ensure competitive
22 and reliable fuel supply to its generating stations. Big Rivers fuel

1 procurement practices include interaction with various departments within
2 the company (finance, generation planning, operations, energy marketing,
3 and material handling) to ensure that the fuel supply agreements being
4 established meet the planned generation and inventory goals of the
5 company. Solid fuel is secured after evaluation of quality, reliability, and
6 competitiveness of the provider. Big Rivers strives for transparency within
7 and outside of the cooperative, ensuring that its procurement practices are
8 sound, ethical, and appropriate for the intended purpose. The company
9 engages in formal competitive bid processes and engages internal controls
10 (internal bid opening processes to include multiple persons and
11 departments, bid tabulation and review by varying constituencies of the
12 company, and internal risk management evaluation) to ensure
13 transparency, accountability, and appropriate officer and management level
14 approval for procurement action.

15
16 **Q. Does this conclude your testimony?**

17 **A. Yes.**

18

19

BIG RIVERS ELECTRIC CORPORATION
AN EXAMINATION OF THE APPLICATION
OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

VERIFICATION

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



Mark W. McAdams

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Mark W. McAdams on
this the 25th day of February, 2013.



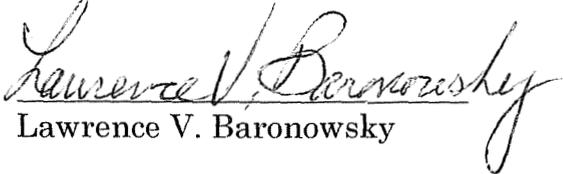
Notary Public, Ky. State at Large
My Commission Expires 8-9-2014

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION
OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

VERIFICATION

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


Lawrence V. Baronowsky

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

BIG RIVERS ELECTRIC CORPORATION
AN EXAMINATION OF THE APPLICATION
OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

VERIFICATION

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



Christopher S. Bradley

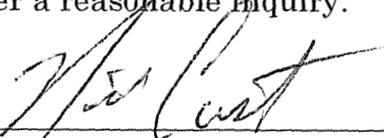
COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION
OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

VERIFICATION

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



Nicholas R. Castlen

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

BIG RIVERS ELECTRIC CORPORATION
AN EXAMINATION OF THE APPLICATION
OF THE FUEL ADJUSTMENT CLAUSE
OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

VERIFICATION

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



Travis A. Siewert

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

Response to Commission Staff's Request for Information
dated February 13, 2013

February 28, 2013

1 Item 1) *If a change in the base fuel cost is proposed, state the month to*
2 *be used as the base period (b). If the base period results in a fuel cost*
3 *other than one representative of current costs as prescribed by 807 KAR*
4 *5:056, Section 1(2), explain why this base period was selected. If no change*
5 *is proposed, include an explanation of the reason(s) Big Rivers believes*
6 *the current base period fuel cost should remain unchanged.*

7
8 **Response)** Big Rivers is not proposing a change in its base fuel cost. When
9 reviewing the data from its last two-year fuel adjustment clause ("FAC") review
10 (Case No. 2010-00495) ("the prior FAC review"), and following a comparable
11 analysis of similar data from the current period under review, *i.e.*, November 1,
12 2010 through October 31, 2012 ("the current FAC review" or "the current FAC
13 review period"), Big Rivers does not believe a change in base fuel cost is
14 warranted.

15 During the prior FAC review, Big Rivers' analysis showed that for
16 the fourteen months ending December 31, 2010, it collected an average of
17 \$0.020916 / kWh through its monthly FAC factor. This represented \$0.010196 /
18 kWh more than what Big Rivers recovered in its base fuel cost of \$0.010720 / kWh
19 during that same time period [$\$0.020916 / \text{kWh} \text{ less } \$0.010720 / \text{kWh} = \0.010196
20 $/ \text{kWh}$]. A similar analysis for the twelve months ending October 31, 2010, shows
21 Big Rivers collected an average of \$0.021083 / kWh through its monthly FAC
22 factor, or \$0.010363 / kWh more than the base fuel cost of \$0.010720 / kWh
23 [$\$0.021083 / \text{kWh} \text{ less } \$0.010720 / \text{kWh} = \$0.010363 / \text{kWh}$]. In that prior FAC
24 review, Big Rivers chose October 2010 as its base fuel cost month. The October

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 2010 data showed that Big Rivers collected \$0.020932 / kWh through its FAC
2 factor, or \$0.010212 / kWh more than the base fuel cost of \$0.010720 / kWh
3 [\$0.020932 / kWh *less* \$0.010720 / kWh = \$0.010212 / kWh]. Consequently, Big
4 Rivers proposed, and the Commission approved, rolling an additional \$0.010212
5 into Big Rivers' base fuel cost, resulting in a revised base fuel cost of \$0.020932.¹

6 Big Rivers conducted a similar analysis for the current FAC review
7 period. Big Rivers performed that analysis on the twelve (12) months ended
8 October 31, 2011, and October 31, 2012, respectively. For the twelve (12) months
9 ending October 31, 2011, Big Rivers collected an average of \$0.021214 / kWh
10 through its monthly FAC factor, or \$0.005388 / kWh more than the average base
11 fuel cost of \$0.015826 / kWh [\$0.021083 / kWh *less* \$0.010720 / kWh = \$0.010363 /
12 kWh].² For the twelve (12) months ending October 31, 2012, Big Rivers collected
13 an average of \$0.023740 / kWh through its monthly FAC factor, or \$0.002808 /
14 kWh more than the average base fuel cost of \$0.020932 / kWh [\$0.023740 / kWh
15 *less* \$0.020932 / kWh = \$0.002808 / kWh].³ The table on the following page
16 summarizes these results. Given the decreasing magnitude of the difference
17 between Big Rivers' FAC collection and its base fuel component, Big River believes
18 no change in the base fuel amount is necessary at this time.

19

¹ Ordering Paragraph No. 2, Commission's Order dated May 31, 2011, in Case No. 2010-00495.

² For seven of the twelve months (November 2010 through May 2011) the base fuel amount was \$0.010720 / kWh. For the last five months of the twelve months (June 2011 through October 2011), the base fuel amount was \$0.020932 / kWh.

³ For this entire twelve-month period the base fuel amount was \$0.020932 / kWh.

BIG RIVERS ELECTRIC CORPORATION

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**Response to Commission Staff's Request for Information
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February 28, 2013

1

Big Rivers Electric Corporation Analysis of FAC Collection versus Base Fuel Amount			
	FAC Collection (per kWh) A	Base Fuel Amount (per kWh) B	Difference (per kWh) C = A - B
14-Months ending <u>2010-12-31</u>	\$0.020916	\$0.010720	\$0.010196
12-Months ending <u>2010-10-31</u>	\$0.021083	\$0.010720	\$0.010363
October 2010	\$0.020932	\$0.010720	\$0.010212
12-Months ending <u>2011-10-31</u>	\$0.021214	\$0.015826	\$0.005388
12-Months ending <u>2012-10-31</u>	\$0.023740	\$0.020932	\$0.002808

2

3 Finally, Big Rivers has also elected to forego a change in its base fuel
4 costs given that Big Rivers filed, on January 15, 2013, an application for a general
5 adjustment in rates. That application, primarily driven by a Notice of
6 Termination from Century Aluminum, included a proposed tariff. Since the filing
7 of that application, Big Rivers has received another Notice of Termination from
8 Alcan Primary Products which will likely require the filing of another general rate
9 application, along with another proposed tariff, sometime in the third quarter of
10 2013.

11

12

13 **Witnesses) Mark W. McAdams and**

14

Travis A. Siewert

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 2)** *Provide a calculation of the fossil fuel costs $F(b)$ that Big*
2 *Rivers proposes to use to calculate the base period fuel cost. This*
3 *calculation shall show each component of $F(b)$ as defined by 807 KAR*
4 *5:056. Explain why the fuel cost in the selected base period is*
5 *representative of the level of fuel cost currently being experienced by Big*
6 *Rivers.*

7

8 **Response)** Not applicable. Please see Big Rivers' response to Item 1 above.

9

10

11 **Witness)** Mark W. McAdams

12

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 3)** *Provide a schedule showing each component of sales as*
2 *defined by 807 KAR 5:056 in the selected base period (b). Explain why Big*
3 *Rivers believes that the sales in the selected base period (b) are*
4 *representative of the level of kWh sales that Big Rivers will derive from the*
5 *level of fuel cost incurred during the selected base period (b).*

6

7 **Response)** Not applicable. Please see Big Rivers' response to Item 1 above.

8

9

10 **Witnesses)** Lindsay N. Barron and

11 Nicholas R. Castlen

12

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 4)** *Provide a schedule showing the calculation of Big Rivers'*
2 *proposed increase or decrease in its base fuel cost per kWh to be*
3 *incorporated into its base rate.*

4

5 **Response)** Not applicable. Please see Big Rivers' response to Item 1 above.

6

7

8 **Witness)** Nicholas R. Castlen

9

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
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Response to Commission Staff's Request for Information
dated February 13, 2013

February 28, 2013

1 **Item 5)** *Provide Big Rivers' most recent projected fuel requirements for*
2 *the years 2013 and 2014 in tons and dollars.*

3

4 **Response)** Please see the schedule below.

5

	<u>2013</u>	<u>2014</u>
Solid Fuel (tons)		
Natural Gas (MCF)		
Fuel Oil (Gallons)		
Solid Fuel		
Natural Gas		
Fuel Oil		
Total		

6

7

8 **Witness)** Mark W. McAdams

9

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 6)** *Provide Big Rivers' most recent sales projections for the years*
2 *2013 and 2014 in kWh and dollars.*

3

4 **Response)** Sales projections for the years 2013 and 2014 are provided in the
5 table below.

6

Year	Member Cooperative Energy (kWh)	Member Cooperative Sales (\$)	Off-System Sales (kWh)	Off-System Sales (\$)
2013 ⁴	9,173,399,000	492,388,163		
2014 ⁵	6,551,701,000	428,077,547		

7

8

9 **Witness)** Lindsay N. Barron

10

⁴ Assumes Century Aluminum is no longer Big Rivers' customer after August 20, 2013..

⁵ Assumes Alcan Aluminum remains Big Rivers' customer for all of 2014. Analysis continues on the impact of Alcan's termination notice dated January 31, 2013.

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 7)** *Provide separately the amounts of power purchases used in*
2 *the calculation of sales provided in response to Item 3.*

3

4 **Response)** Not applicable. Please see the response to Item 3 above.

5

6

7 **Witness)** Nicholas R. Castlen

8

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 8)** *Provide separately the amounts of intersystem power sales*
2 *used in the calculation of sales provided in response to Item 3.*

3

4 **Response)** Not applicable. Please see the response to Item 3 above.

5

6

7 **Witness)** Nicholas R. Castlen

8

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 9)** *Provide the planned maintenance schedule for each of Big*
2 *Rivers' generating units for the years 2013 and 2014.*

3

4 **Response)** Please see the redacted schedules below for the planned maintenance
5 schedule for Big Rivers' generating units for the years 2013 and 2014. The
6 unredacted schedule is being provided with a Petition for Confidential Treatment.

7

2013 Outage Schedule				
Start	End	Hours	Days	Unit/Outage
[REDACTED]				
Total		[REDACTED]		

8

9

2014 Outage Schedule				
Start	End	Hours	Days	Unit/Outage
[REDACTED]				
Total		[REDACTED]		

10

11

12 **Witness)** Lawrence V. Baronowsky

13

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 10)** *For the years ending October 31, 2011, and October 31, 2012,*
2 *provide:*

3

4 *a. Maximum annual system demand; and*

5 *b. Average annual demand.*

6

7 **Response)**

8 a. November 1, 2010 through October 31, 2011 –1571 MW;

9 November 1, 2011 through October 31, 2012 –1633 MW.

10 b. November 1, 2010 through October 31, 2011 –1232 MW;

11 November 1, 2011 through October 31, 2012 –1305 MW.

12

13 Big Rivers notes that the above are metered values for its balancing authority
14 area and include load from Henderson Municipal Power & Light (“HMP&L”) and
15 power self-generated by Domtar Paper Company LLC, but these values do not
16 include transmission losses. Average annual demand was calculated by taking
17 the average of hourly loads for the subject year.

18

19

20 **Witness)** Lindsay N. Barron

21

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

Response to Commission Staff's Request for Information
dated February 13, 2013

February 28, 2013

1 Item 11) *List all firm power commitments for Big Rivers for the years*
2 *2013 and 2014 for (a) purchases and (b) sales. This list shall identify the*
3 *other party (buyer or seller), the amount of commitment in MW, and the*
4 *purpose of the commitment (e.g., peaking, emergency).*

5

6 **Response)**

7

a. Purchases: Southeastern Power Administration ("SEPA"), up to
8 178 MW, energy for system. Presently a force majeure has been
9 declared by SEPA for this contract due to dam safety issues at
10 Wolf Creek and Center Hill dams on the Cumberland System.
11 Currently SEPA is providing a run-of-the river-schedule that Big
12 Rivers has the right to refuse.

13

b. Sales: Big Rivers has no non-member firm power sales
14 commitments for the years 2013 and 2014.

15

16

17 **Witness)** Lindsay N. Barron

18

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 12)** *Provide a monthly billing summary for all sales to all electric*
2 *utilities for the period May 1, 2012 through October 31, 2012.*

3

4 **Response)** Please see the attached monthly billing summaries for sales to all
5 electric utilities for the period May 1, 2012 through October 31, 2012.

6

7

8 **Witness)** Nicholas R. Castlen

9

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

May 2012

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (FPF) \$	ORDER BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$
1 MAY 2012								
2								
3 JP RURALS	127,096	56,014,780	\$ 1,207,412.00	\$ 1,665,655.50	\$ 2,873,067.50		\$ -	\$ 2,873,067.50
4 KENERGY RURALS	222,340	96,500,993	\$ 2,112,230.00	\$ 2,869,553.53	\$ 4,981,783.53		\$ -	\$ 4,981,783.53
5 MEADE CO. RURALS	79,686	35,013,590	\$ 757,017.00	\$ 1,041,164.11	\$ 1,798,181.11		\$ -	\$ 1,798,181.11
6								
7 TOTAL RURALS	429,122	187,529,363	\$ 4,076,659.00	\$ 5,576,373.14	\$ 9,653,032.14	\$ -	\$ -	\$ 9,653,032.14
8								
9 KI-ACCURIDE	5,163	2,385,150	\$ 54,211.50	\$ 58,448.10	\$ 112,659.60	\$ 1,071.00	\$ -	\$ 112,659.60
10 KI-ALCOA	116	77,620	\$ 1,218.00	\$ 1,902.08	\$ 3,120.08	\$ -	\$ -	\$ 4,191.08
11 KI-ALERIS	26,951	15,667,440	\$ 282,985.50	\$ 383,930.62	\$ 666,916.12	\$ -	\$ -	\$ 666,916.12
12 KI-SEBREE MINING STEAMPORT (ALLIED)	7,553	3,208,790	\$ 79,306.50	\$ 78,631.40	\$ 157,937.90	\$ -	\$ -	\$ 157,937.90
13 KI-ARMSTRONG - BIG RUN	-	-	\$ -	\$ -	\$ -	\$ 6,371.90	\$ -	\$ -
14 KI-ARMSTRONG - DOCK	7,661	3,372,390	\$ 80,440.50	\$ 82,640.42	\$ 163,080.92	\$ 3,133.11	\$ -	\$ 169,452.82
15 KI-ARMSTRONG - EQUALITY	3,245	1,452,370	\$ 34,072.50	\$ 35,590.33	\$ 69,662.83	\$ -	\$ -	\$ 72,795.94
16 KI-ARMSTRONG - LEWIS CREEK	1,000	285,120	\$ 10,500.00	\$ 6,986.87	\$ 17,486.87	\$ 254.79	\$ -	\$ 17,741.66
17 KI-ARMSTRONG - MIDWAY	3,424	1,850,400	\$ 35,952.00	\$ 45,344.05	\$ 81,296.05	\$ 1,669.50	\$ -	\$ 82,965.55
18 KI-DOMTAR PAPER CO.	15,000	10,954,968	\$ 157,500.00	\$ 268,451.49	\$ 425,951.49	\$ -	\$ -	\$ 425,951.49
19 KI-DOTIKI #4	789	559,570	\$ 8,284.50	\$ 13,712.26	\$ 21,996.76	\$ 94.50	\$ -	\$ 22,091.26
20 KI-HOPKINS CO. COAL	334	167,310	\$ 3,507.00	\$ 4,099.93	\$ 7,606.93	\$ -	\$ -	\$ 7,606.93
21 KI-KB ALLOYS, INC.	2,001	684,130	\$ 21,010.50	\$ 16,764.61	\$ 37,775.11	\$ -	\$ -	\$ 37,775.11
22 KI-KIMBERLY-CLARK	37,066	24,770,720	\$ 389,193.00	\$ 607,006.49	\$ 996,199.49	\$ -	\$ -	\$ 996,199.49
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)	126	45,850	\$ 1,323.00	\$ 1,123.55	\$ 2,446.55	\$ 126.00	\$ -	\$ 2,572.55
24 KI-PATRIOT COAL, LP	4,542	1,346,740	\$ 47,691.00	\$ 33,001.86	\$ 80,692.86	\$ 3,402.00	\$ -	\$ 84,094.86
25 KI-ROLL COATER	3,568	1,549,850	\$ 37,464.00	\$ 37,979.07	\$ 75,443.07	\$ 420.00	\$ -	\$ 75,863.07
26 KI-SOUTHWIRE CO.	7,008	4,343,770	\$ 73,584.00	\$ 106,444.08	\$ 180,028.08	\$ -	\$ -	\$ 180,028.08
27 KI-TYSON FOODS	10,906	5,710,280	\$ 114,513.00	\$ 139,930.41	\$ 254,443.41	\$ -	\$ -	\$ 254,443.41
28 KI-VALLEY GRAIN	1,961	922,670	\$ 20,590.50	\$ 22,610.03	\$ 43,200.53	\$ 3,790.50	\$ -	\$ 46,991.03
29								
30 SUBTOTAL INDUSTRIALS	138,414	79,355,138	\$ 1,453,347.00	\$ 1,944,597.65	\$ 3,397,944.65	\$ 20,333.30	\$ -	\$ 3,418,277.95
31								
32 JPI-SHELL OIL	2,063	581,250	\$ 21,661.50	\$ 14,243.53	\$ 35,905.03	\$ -	\$ -	\$ 35,905.03
33								
34 TOTAL INDUSTRIALS	140,477	79,936,388	\$ 1,475,008.50	\$ 1,958,841.18	\$ 3,433,849.68	\$ 20,333.30	\$ -	\$ 3,454,182.98
35								
36 GRAND TOTAL	569,599	267,465,751	\$ 5,551,667.50	\$ 7,535,214.32	\$ 13,086,881.82	\$ 20,333.30	\$ -	\$ 13,107,215.12

Case No. 2012-00555

Attachment for Response to Staff Item 12

Witness: Nicholas R. Castlen

Big Rivers Electric Corporation
Monthly Billing Summary
Electric Utility Sales
May 2012

	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FAC \$	FUEL MILLS/KWH	ES \$	ES MILLS/KWH	US \$
1 MAY 2012							
2							
3 JP RURALS	\$ 15.16	\$ 2,873,082.66	\$ 186,305.16	3.33	\$ 107,604.39	1.92	\$ (234,253.81)
4 KENERGY RURALS	\$ -	\$ 4,981,783.53	\$ 320,962.30	3.33	\$ 185,378.41	1.92	\$ (403,567.15)
5 MEADE CO. RURALS	\$ -	\$ 1,798,181.11	\$ 116,455.20	3.33	\$ 67,261.11	1.92	\$ (146,426.83)
6							
7 TOTAL RURALS	\$ 15.16	\$ 9,653,047.30	\$ 623,722.66	3.33	\$ 360,243.91	1.92	\$ (784,247.79)
8							
9 KI-ACCURIDE		\$ 112,659.60	\$ 7,933.01	3.33	\$ 4,581.87	1.92	\$ (9,974.70)
10 KI-ALCOA		\$ 4,191.08	\$ 258.16	3.33	\$ 149.11	1.92	\$ (324.61)
11 KI-ALERIS		\$ 666,916.12	\$ 52,109.91	3.33	\$ 30,097.15	1.92	\$ (65,521.23)
12 KI-SEBREE MINING		\$ 157,937.90	\$ 10,672.44	3.33	\$ 6,164.09	1.92	\$ (13,419.16)
13 STEAMPORT (ALLIED)		\$ -	\$ -	0.00	\$ -	0.00	\$ -
14 KI-ARMSTRONG - BIG RUN		\$ 169,452.82	\$ 11,216.57	3.33	\$ 6,478.36	1.92	\$ (14,103.33)
15 KI-ARMSTRONG - DOCK		\$ 72,795.94	\$ 4,830.58	3.33	\$ 2,790.00	1.92	\$ (6,073.81)
16 KI-ARMSTRONG - EQUALITY		\$ 17,741.66	\$ 948.31	3.33	\$ 547.72	1.92	\$ (1,192.37)
17 KI-ARMSTRONG - LEWIS		\$ 82,965.55	\$ 6,154.43	3.33	\$ 3,554.62	1.92	\$ (7,738.37)
18 KI-ARMSTRONG - MIDWAY		\$ 425,951.49	\$ 36,436.22	3.33	\$ 21,044.49	1.92	\$ (45,813.68)
19 KI-DOMTAR PAPER CO.		\$ 22,091.26	\$ 1,861.13	3.33	\$ 1,074.93	1.92	\$ (2,340.12)
20 KI-DOTIKI #4		\$ 7,606.93	\$ 556.47	3.33	\$ 321.40	1.92	\$ (699.69)
21 KI-HOPKINS CO. COAL		\$ 37,775.11	\$ 2,275.42	3.33	\$ 1,314.21	1.92	\$ (2,861.03)
22 KI-KB ALLOYS, INC.		\$ 996,199.49	\$ 82,387.41	3.33	\$ 47,584.55	1.92	\$ (103,591.15)
23 KI-KIMBERLY-CLARK		\$ 2,572.55	\$ 152.50	3.33	\$ 88.08	1.92	\$ (191.74)
24 KI-SEBREE MINING - KMMC,		\$ 84,094.86	\$ 4,479.26	3.33	\$ 2,587.09	1.92	\$ (5,632.07)
25 LLC (KMMC, LLC)		\$ 75,863.07	\$ 5,154.80	3.33	\$ 2,977.26	1.92	\$ (6,481.47)
26 KI-PATRIOT COAL, LP		\$ 180,028.08	\$ 14,447.38	3.33	\$ 8,344.38	1.92	\$ (18,165.65)
27 KI-SOUTHWIRE CO.		\$ 254,443.41	\$ 18,992.39	3.33	\$ 10,969.45	1.92	\$ (23,880.39)
28 KI-TYSON FOODS		\$ 46,991.03	\$ 3,068.80	3.33	\$ 1,772.45	1.92	\$ (3,858.61)
29 KI-VALLEY GRAIN							
30 SUBTOTAL INDUSTRIALS	\$ -	\$ 3,418,277.95	\$ 263,935.19	3.33	\$ 152,441.21	1.92	\$ (331,863.18)
31							
32 JPI-SHELL OIL		\$ 35,905.03	\$ 1,933.24	3.33	\$ 1,116.58	1.92	\$ (2,430.79)
33							
34 TOTAL INDUSTRIALS	\$ -	\$ 3,454,182.98	\$ 265,868.43	3.33	\$ 153,557.79	1.92	\$ (334,293.97)
35							
36 GRAND TOTAL	\$ 15.16	\$ 13,107,230.28	\$ 889,591.09	3.33	\$ 513,801.70	1.92	\$ (1,118,541.76)

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

May 2012

	US MILLS/ KWH	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	REVENUE \$ NET OF MRSM \$	REV NET OF MRSM MILLS/ KWH
1 MAY 2012									
2									
3 JP RURALS	(4.18)	\$ (58,311.39)	(1.04)	\$ 2,874,427.01	51.32	\$ (407,619.55)	(7.28)	\$ 2,466,807.46	44.04
4 KENERGY RURALS	(4.18)	\$ (100,457.53)	(1.04)	\$ 4,984,099.56	51.65	\$ (702,237.73)	(7.28)	\$ 4,281,861.83	44.37
5 MEADE CO. RURALS	(4.18)	\$ (36,449.15)	(1.04)	\$ 1,799,021.44	51.38	\$ (254,793.90)	(7.28)	\$ 1,544,227.54	44.10
6									
7 TOTAL RURALS	(4.18)	\$ (195,218.07)	(1.04)	\$ 9,657,548.01	51.50	\$ (1,364,651.18)	(7.28)	\$ 8,292,896.83	44.22
8									
9 KI-ACCURIDE	(4.18)	\$ (2,482.94)	(1.04)	\$ 112,716.84	47.26	\$ (17,356.73)	(7.28)	\$ 95,360.11	39.98
10 KI-ALCOA	(4.18)	\$ (80.80)	(1.04)	\$ 4,192.94	54.02	\$ (564.84)	(7.28)	\$ 3,628.10	46.74
11 KI-ALERIS	(4.18)	\$ (16,309.81)	(1.04)	\$ 667,292.14	42.59	\$ (114,011.97)	(7.28)	\$ 553,280.17	35.31
12 KI-SEBREE MINING STEAMPORT (ALLIED)	(4.18)	\$ (3,340.35)	(1.04)	\$ 158,014.92	49.24	\$ (23,350.37)	(7.28)	\$ 134,664.55	41.97
13 KI-ARMSTRONG - BIG RUN	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00
14 KI-ARMSTRONG - DOCK	(4.18)	\$ (3,510.66)	(1.04)	\$ 169,533.76	50.27	\$ (24,540.89)	(7.28)	\$ 144,992.87	42.99
15 KI-ARMSTRONG - EQUALITY	(4.18)	\$ (1,511.92)	(1.04)	\$ 72,830.79	50.15	\$ (10,568.89)	(7.28)	\$ 62,261.90	42.87
16 KI-ARMSTRONG - LEWIS CREEK	(4.18)	\$ (296.81)	(1.04)	\$ 17,748.51	62.25	\$ (2,074.83)	(7.28)	\$ 15,673.68	54.97
17 KI-ARMSTRONG - MIDWAY	(4.18)	\$ (1,926.27)	(1.04)	\$ 83,009.96	44.86	\$ (13,465.36)	(7.28)	\$ 69,544.60	37.58
18 KI-DOMTAR PAPER CO.	(4.18)	\$ (11,404.12)	(1.04)	\$ 426,214.40	38.91	\$ (79,719.29)	(7.28)	\$ 346,495.11	31.63
19 KI-DOTIKI #4	(4.18)	\$ (582.51)	(1.04)	\$ 22,104.69	39.50	\$ (4,071.99)	(7.28)	\$ 18,032.70	32.23
20 KI-HOPKINS CO. COAL	(4.18)	\$ (174.17)	(1.04)	\$ 7,610.94	45.49	\$ (1,217.51)	(7.28)	\$ 6,393.43	38.21
21 KI-KB ALLOYS, INC.	(4.18)	\$ (712.18)	(1.04)	\$ 37,791.53	55.24	\$ (4,978.42)	(7.28)	\$ 32,813.11	47.96
22 KI-KIMBERLY-CLARK	(4.18)	\$ (25,786.32)	(1.04)	\$ 996,793.98	40.24	\$ (180,256.52)	(7.28)	\$ 816,537.46	32.96
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)	(4.18)	\$ (47.73)	(1.04)	\$ 2,573.66	56.13	\$ (333.66)	(7.28)	\$ 2,240.00	48.85
24 KI-PATRIOT COAL, LP	(4.18)	\$ (1,401.96)	(1.04)	\$ 84,127.18	62.47	\$ (9,800.23)	(7.28)	\$ 74,326.95	55.19
25 KI-ROLL COATER	(4.18)	\$ (1,613.39)	(1.04)	\$ 75,900.27	48.97	\$ (11,278.26)	(7.28)	\$ 64,622.01	41.70
26 KI-SOUTHWIRE CO.	(4.18)	\$ (4,521.86)	(1.04)	\$ 180,132.33	41.47	\$ (31,609.61)	(7.28)	\$ 148,522.72	34.19
27 KI-TYSON FOODS	(4.18)	\$ (5,944.40)	(1.04)	\$ 254,580.46	44.58	\$ (41,553.71)	(7.28)	\$ 213,026.75	37.31
28 KI-VALLEY GRAIN	(4.18)	\$ (960.50)	(1.04)	\$ 47,013.17	50.95	\$ (6,714.27)	(7.28)	\$ 40,298.90	43.68
29									
30 SUBTOTAL INDUSTRIALS	(4.18)	\$ (82,608.70)	(1.04)	\$ 3,420,182.47	43.10	\$ (577,467.35)	(7.28)	\$ 2,842,715.12	35.82
31									
32 JPI-SHELL OIL	(4.18)	\$ (605.08)	(1.04)	\$ 35,918.98	61.80	\$ (4,229.76)	(7.28)	\$ 31,689.22	54.52
33									
34 TOTAL INDUSTRIALS	(4.18)	\$ (83,213.78)	(1.04)	\$ 3,456,101.45	43.24	\$ (581,697.11)	(7.28)	\$ 2,874,404.34	35.96
35									
36 GRAND TOTAL	(4.18)	\$ (278,431.85)	(1.04)	\$ 13,113,649.46	49.03	\$ (1,946,348.29)	(7.28)	\$ 11,167,301.17	41.75

Case No. 2012-00555

Attachment for Response to Staff Item 12

Witness: Nicholas R. Castlen

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Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

June 2012

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$	ORDER BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$
1 JUNE 2012								
2								\$ 3,340,456.18
3 JP RURALS	158,128	61,818,677	\$ 1,502,216.00	\$ 1,838,240.18	\$ 3,340,456.18			\$ 5,808,862.65
4 KENERGY RURALS	274,664	107,598,690	\$ 2,609,308.00	\$ 3,199,554.65	\$ 5,808,862.65			\$ 2,105,671.41
5 MEADE CO. RURALS	101,424	38,409,450	\$ 963,528.00	\$ 1,142,143.41	\$ 2,105,671.41			
6								\$ 11,254,990.24
7 TOTAL RURALS	534,216	207,826,817	\$ 5,075,052.00	\$ 6,179,938.24	\$ 11,254,990.24	\$ -	\$ -	
8								\$ 111,067.41
9 KI-ACCURIDE	5,390	2,222,910	\$ 56,595.00	\$ 54,472.41	\$ 111,067.41	\$ -	\$ -	\$ 4,081.67
10 KI-ALCOA	113	71,870	\$ 1,186.50	\$ 1,761.17	\$ 2,947.67	\$ 1,134.00	\$ -	\$ 677,462.62
11 KI-ALERIS	28,388	15,482,090	\$ 298,074.00	\$ 379,388.62	\$ 677,462.62	\$ -	\$ -	\$ 121,151.51
12 KI-SEBREE MINING STEAMPORT (ALLIED)	7,264	1,831,443	\$ 76,272.00	\$ 44,879.51	\$ 121,151.51	\$ -	\$ -	\$ -
13 KI-ARMSTRONG - BIG RUN	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 166,214.35
14 KI-ARMSTRONG - DOCK	7,623	3,214,490	\$ 80,041.50	\$ 78,771.08	\$ 158,812.58	\$ 7,401.77	\$ -	\$ 72,491.21
15 KI-ARMSTRONG - EQUALITY	3,093	1,504,320	\$ 32,476.50	\$ 36,863.36	\$ 69,339.86	\$ 3,151.35	\$ -	\$ 17,520.80
16 KI-ARMSTRONG - LEWIS CREEK	1,000	277,270	\$ 10,500.00	\$ 6,794.50	\$ 17,294.50	\$ 226.30	\$ -	\$ 81,421.56
17 KI-ARMSTRONG - MIDWAY	3,456	1,807,960	\$ 36,288.00	\$ 44,304.06	\$ 80,592.06	\$ 829.50	\$ -	\$ 421,198.26
18 KI-DOMTAR PAPER CO.	15,000	10,760,998	\$ 157,500.00	\$ 263,698.26	\$ 421,198.26	\$ -	\$ -	\$ 21,660.99
19 KI-DOTIKI #4	788	542,440	\$ 8,274.00	\$ 13,292.49	\$ 21,566.49	\$ 94.50	\$ -	\$ 5,602.44
20 KI-HOPKINS CO. COAL	340	82,940	\$ 3,570.00	\$ 2,032.44	\$ 5,602.44	\$ -	\$ -	\$ 36,506.97
21 KI-KB ALLOYS, INC.	2,001	632,380	\$ 21,010.50	\$ 15,496.47	\$ 36,506.97	\$ -	\$ -	\$ 1,011,866.46
22 KI-KIMBERLY-CLARK	37,325	25,299,080	\$ 391,912.50	\$ 619,953.96	\$ 1,011,866.46	\$ -	\$ -	\$ 2,317.15
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)	120	43,140	\$ 1,260.00	\$ 1,057.15	\$ 2,317.15	\$ -	\$ -	\$ 58,501.83
24 KI-PATRIOT COAL, LP	3,300	909,930	\$ 34,650.00	\$ 22,297.83	\$ 56,947.83	\$ 1,554.00	\$ -	\$ 76,865.68
25 KI-PRECOAT (ROLL COATER)	3,493	1,640,040	\$ 36,676.50	\$ 40,189.18	\$ 76,865.68	\$ -	\$ -	\$ 180,211.45
26 KI-SOUTHWIRE CO.	6,993	4,357,680	\$ 73,426.50	\$ 106,784.95	\$ 180,211.45	\$ -	\$ -	\$ 273,839.44
27 KI-TYSON FOODS	11,392	6,293,550	\$ 119,616.00	\$ 154,223.44	\$ 273,839.44	\$ -	\$ -	\$ 46,615.77
28 KI-VALLEY GRAIN	1,994	903,500	\$ 20,937.00	\$ 22,140.27	\$ 43,077.27	\$ 3,538.50	\$ -	\$ 3,386,597.57
29								\$ 27,806.10
30 SUBTOTAL INDUSTRIALS	139,073	77,878,031	\$ 1,460,266.50	\$ 1,908,401.15	\$ 3,368,667.65	\$ 17,929.92	\$ -	\$ 3,414,403.67
31								\$ 14,669,393.91
32 JPI-SHELL OIL	1,912	315,450	\$ 20,076.00	\$ 7,730.10	\$ 27,806.10	\$ -	\$ -	\$ 14,669,393.91
33								
34 TOTAL INDUSTRIALS	140,985	78,193,481	\$ 1,480,342.50	\$ 1,916,131.25	\$ 3,396,473.75	\$ 17,929.92	\$ -	\$ 14,669,393.91
35								
36 GRAND TOTAL	675,201	286,020,298	\$ 6,555,394.50	\$ 8,096,069.49	\$ 14,651,463.99	\$ 17,929.92	\$ -	\$ 14,669,393.91

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

June 2012

	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FAC \$	FUEL MILLS/KWH	ES \$	ES MILLS/KWH	US \$
1 JUNE 2012							
2				2.64	\$ 137,484.74	2.22	\$ (258,525.71)
3 JP RURALS			\$ 163,201.31	2.64	\$ 239,299.49	2.22	\$ (449,977.72)
4 KENERGY RURALS			\$ 284,060.54	2.64	\$ 85,422.62	2.22	\$ (160,628.32)
5 MEADE CO. RURALS			\$ 101,400.95				
6	\$ 15.16	\$ 3,340,471.34	\$ 548,662.80	2.64	\$ 462,206.85	2.22	\$ (869,131.75)
7 TOTAL RURALS	\$ 15.16	\$ 11,255,005.40	\$ 5,868.48	2.64	\$ 4,943.75	2.22	\$ (9,296.21)
8		\$ 111,067.41	\$ 189.74	2.64	\$ 159.84	2.22	\$ (300.56)
9 KI-ACCURIDE		\$ 4,081.67	\$ 40,872.72	2.64	\$ 34,432.17	2.22	\$ (64,746.10)
10 KI-ALCOA		\$ 677,462.62	\$ 4,835.01	2.64	\$ 4,073.13	2.22	\$ (7,659.09)
11 KI-ALERIS		\$ 121,151.51	\$ -	0.00	\$ -	0.00	\$ -
12 KI-SEBREE MINING		\$ -	\$ -	2.64	\$ 7,149.03	2.22	\$ (13,443.00)
STEAMPORT (ALLIED)		\$ -	\$ 8,486.25	2.64	\$ 3,345.61	2.22	\$ (6,291.07)
13 KI-ARMSTRONG - BIG RUN		\$ 166,214.35	\$ 3,971.40	2.64	\$ -	2.22	\$ (1,159.54)
14 KI-ARMSTRONG - DOCK		\$ 72,491.21	\$ 731.99	2.64	\$ 616.65	2.22	\$ (7,560.89)
15 KI-ARMSTRONG - EQUALITY		\$ 17,520.80	\$ 4,773.01	2.64	\$ 4,020.90	2.22	\$ (45,002.49)
16 KI-ARMSTRONG - LEWIS		\$ 81,421.56	\$ 28,409.03	2.64	\$ 23,932.46	2.22	\$ (2,268.48)
CREEK		\$ 421,198.26	\$ 1,432.04	2.64	\$ 1,206.39	2.22	\$ (346.86)
17 KI-ARMSTRONG - MIDWAY		\$ 21,660.99	\$ 218.96	2.64	\$ 184.46	2.22	\$ (2,644.61)
18 KI-DOMTAR PAPER CO.		\$ 5,602.44	\$ 1,669.48	2.64	\$ 1,406.41	2.22	\$ (105,800.75)
19 KI-DOTIKI #4		\$ 36,506.97	\$ 66,789.57	2.64	\$ 56,265.15	2.22	\$ (180.41)
20 KI-HOPKINS CO. COAL		\$ 1,011,866.46	\$ 113.89	2.64	\$ 95.94	2.22	\$ (3,805.33)
21 KI-KB ALLOYS, INC.		\$ 2,317.15	\$ 2,402.22	2.64	\$ 2,023.68	2.22	\$ (6,858.65)
22 KI-KIMBERLY-CLARK		\$ 58,501.83	\$ 4,329.71	2.64	\$ 3,647.45	2.22	\$ (18,223.82)
23 KI-SEBREE MINING - KMMC,		\$ 76,865.68	\$ 11,504.28	2.64	\$ 9,691.48	2.22	\$ (26,319.63)
LLC (KMMC, LLC)		\$ 180,211.45	\$ 16,614.97	2.64	\$ 13,996.86	2.22	\$ (3,778.44)
24 KI-PATRIOT COAL, LP		\$ 273,839.44	\$ 2,385.24	2.64	\$ 2,009.38	2.22	\$ (325,685.93)
25 KI-PRECOAT (ROLL COATER)		\$ 46,615.77	\$ -				
26 KI-SOUTHWIRE CO.		\$ -	\$ 205,597.99	2.64	\$ 173,200.74	2.22	\$ (1,319.21)
27 KI-TYSON FOODS		\$ 3,386,597.57	\$ 832.79	2.64	\$ 701.56	2.22	\$ (327,005.14)
28 KI-VALLEY GRAIN		\$ 27,806.10	\$ 206,430.78	2.64	\$ 173,902.30	2.22	\$ (1,196,136.89)
29	\$ -	\$ 3,414,403.67	\$ 755,093.58	2.64	\$ 636,109.15	2.22	\$ -
30 SUBTOTAL INDUSTRIALS	\$ -	\$ 3,414,403.67	\$ 755,093.58	2.64	\$ 636,109.15	2.22	\$ -
31							
32 JPI-SHELL OIL		\$ 3,414,403.67	\$ 755,093.58	2.64	\$ 636,109.15	2.22	\$ -
33							
34 TOTAL INDUSTRIALS		\$ 3,414,403.67	\$ 755,093.58	2.64	\$ 636,109.15	2.22	\$ -
35	\$ 15.16	\$ 14,669,409.07					
36 GRAND TOTAL	\$ 15.16	\$ 14,669,409.07					

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

June 2012

	US MILLS/ KWH	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	REVENUE \$ NET OF MRSM	REV NET OF MRSM MILLS/ KWH
1 JUNE 2012									
2					53.68	\$ (426,177.96)	(6.89)	\$ 2,892,100.48	46.78
3 JP RURALS	(4.18)	\$ (64,353.24)	(1.04)	\$ 3,318,278.44	53.63	\$ (741,785.37)	(6.89)	\$ 5,028,449.35	46.73
4 KENERGY RURALS	(4.18)	\$ (112,010.24)	(1.04)	\$ 5,770,234.72	54.46	\$ (264,794.75)	(6.89)	\$ 1,827,087.67	47.57
5 MEADE CO. RURALS	(4.18)	\$ (39,984.24)	(1.04)	\$ 2,091,882.42					
6					53.80	\$ (1,432,758.08)	(6.89)	\$ 9,747,637.50	46.90
7 TOTAL RURALS	(4.18)	\$ (216,347.72)	(1.04)	\$ 11,180,395.58					
8					49.61	\$ (15,324.74)	(6.89)	\$ 94,944.64	42.71
9 KI-ACCURIDE	(4.18)	\$ (2,314.05)	(1.04)	\$ 110,269.38	56.43	\$ (495.48)	(6.89)	\$ 3,560.39	49.54
10 KI-ALCOA	(4.18)	\$ (74.82)	(1.04)	\$ 4,055.87	43.40	\$ (106,733.53)	(6.89)	\$ 565,171.02	36.50
11 KI-ALERIS	(4.18)	\$ (16,116.86)	(1.04)	\$ 671,904.55					
12 KI-SEBREE MINING STEAMPORT (ALLIED)	(4.18)	\$ (1,906.53)	(1.04)	\$ 120,494.03	65.79	\$ (12,625.98)	(6.89)	\$ 107,868.05	58.90
13 KI-ARMSTRONG - BIG RUN	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00
14 KI-ARMSTRONG - DOCK	(4.18)	\$ (3,346.28)	(1.04)	\$ 165,060.35	51.35	\$ (22,160.69)	(6.89)	\$ 142,899.66	44.45
15 KI-ARMSTRONG - EQUALITY	(4.18)	\$ (1,566.00)	(1.04)	\$ 71,951.15	47.83	\$ (10,370.78)	(6.89)	\$ 61,580.37	40.94
16 KI-ARMSTRONG - LEWIS CREEK	(4.18)	\$ (288.64)	(1.04)	\$ 17,421.26	62.83	\$ (1,911.50)	(6.89)	\$ 15,509.76	55.94
17 KI-ARMSTRONG - MIDWAY	(4.18)	\$ (1,882.09)	(1.04)	\$ 80,772.49	44.68	\$ (12,464.07)	(6.89)	\$ 68,308.42	37.78
18 KI-DOMTAR PAPER CO.	(4.18)	\$ (11,202.20)	(1.04)	\$ 417,335.06	38.78	\$ (74,186.32)	(6.89)	\$ 343,148.74	31.89
19 KI-DOTIKI #4	(4.18)	\$ (564.68)	(1.04)	\$ 21,466.26	39.57	\$ (3,739.59)	(6.89)	\$ 17,726.67	32.68
20 KI-HOPKINS CO. COAL	(4.18)	\$ (86.34)	(1.04)	\$ 5,572.66	67.19	\$ (571.78)	(6.89)	\$ 5,000.88	60.30
21 KI-KB ALLOYS, INC.	(4.18)	\$ (658.31)	(1.04)	\$ 36,279.94	57.37	\$ (4,359.62)	(6.89)	\$ 31,920.32	50.48
22 KI-KIMBERLY-CLARK	(4.18)	\$ (26,336.34)	(1.04)	\$ 1,002,784.09	39.64	\$ (174,411.85)	(6.89)	\$ 828,372.24	32.74
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)	(4.18)	\$ (44.91)	(1.04)	\$ 2,301.66	53.35	\$ (297.41)	(6.89)	\$ 2,004.25	46.46
24 KI-PATRIOT COAL, LP	(4.18)	\$ (947.24)	(1.04)	\$ 58,175.16	63.93	\$ (6,273.06)	(6.89)	\$ 51,902.10	57.04
25 KI-PRECOAT (ROLL COATER)	(4.18)	\$ (1,707.28)	(1.04)	\$ 76,276.91	46.51	\$ (11,306.44)	(6.89)	\$ 64,970.47	39.62
26 KI-SOUTHWIRE CO.	(4.18)	\$ (4,536.34)	(1.04)	\$ 178,647.05	41.00	\$ (30,041.85)	(6.89)	\$ 148,605.20	34.10
27 KI-TYSON FOODS	(4.18)	\$ (6,551.59)	(1.04)	\$ 271,580.05	43.15	\$ (43,387.73)	(6.89)	\$ 228,192.32	36.26
28 KI-VALLEY GRAIN	(4.18)	\$ (940.54)	(1.04)	\$ 46,291.41	51.24	\$ (6,228.72)	(6.89)	\$ 40,062.69	44.34
29					43.13	\$ (536,891.14)	(6.89)	\$ 2,821,748.19	36.23
30 SUBTOTAL INDUSTRIALS	(4.18)	\$ (81,071.04)	(1.04)	\$ 3,358,639.33					
31					87.79	\$ (2,174.72)	(6.89)	\$ 25,518.14	80.89
32 JPI-SHELL OIL	(4.18)	\$ (328.38)	(1.04)	\$ 27,692.86					
33					43.31	\$ (539,065.86)	(6.89)	\$ 2,847,266.33	36.41
34 TOTAL INDUSTRIALS	(4.18)	\$ (81,399.42)	(1.04)	\$ 3,386,332.19					
35					50.93	\$ (1,971,823.94)	(6.89)	\$ 12,594,903.83	44.04
36 GRAND TOTAL	(4.18)	\$ (297,747.14)	(1.04)	\$ 14,566,727.77					

Case No. 2012-00535

Attachment for Response to Staff Item 12

Witness: Nicholas R. Castlen

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Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

July 2012

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$	ORDER BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$
1 JULY 2012								\$ 3,775,482.62
2	154,043	77,753,367	\$ 1,463,408.50	\$ 2,312,074.12	\$ 3,775,482.62		\$ -	\$ 6,686,588.74
3 JP RURALS	277,857	136,095,885	\$ 2,639,641.50	\$ 4,046,947.24	\$ 6,686,588.74		\$ -	\$ 2,426,549.75
4 KENERGY RURALS	101,281	49,246,040	\$ 962,169.50	\$ 1,464,380.25	\$ 2,426,549.75		\$ -	\$ -
5 MEADE CO. RURALS								\$ 12,888,621.11
6	533,181	263,095,292	\$ 5,065,219.50	\$ 7,823,401.61	\$ 12,888,621.11	\$ -	\$ -	\$ -
7 TOTAL RURALS								\$ 118,337.65
8	5,526	2,461,320	\$ 58,023.00	\$ 60,314.65	\$ 118,337.65	\$ -	\$ -	\$ 3,993.58
9 KI-ACCURIDE	108	72,560	\$ 1,134.00	\$ 1,778.08	\$ 2,912.08	\$ 1,081.50	\$ -	\$ 669,277.83
10 KI-ALCOA	26,630	15,901,360	\$ 279,615.00	\$ 389,662.83	\$ 669,277.83	\$ -	\$ -	\$ 124,879.47
11 KI-ALERIS	6,637	2,252,233	\$ 69,688.50	\$ 55,190.97	\$ 124,879.47	\$ -	\$ -	\$ -
12 KI-SEBREE MINING STEAMPOR								\$ 167,645.75
13 KI-ARMSTRONG - BIG RUN	7,995	3,151,827	\$ 83,947.50	\$ 77,235.52	\$ 161,183.02	\$ 6,462.73	\$ -	\$ 75,304.14
14 KI-ARMSTRONG - DOCK	3,251	1,537,520	\$ 34,135.50	\$ 37,676.93	\$ 71,812.43	\$ 3,491.71	\$ -	\$ 19,171.77
15 KI-ARMSTRONG - EQUALITY	1,115	297,720	\$ 11,707.50	\$ 7,295.63	\$ 19,003.13	\$ 168.64	\$ -	\$ 79,926.50
16 KI-ARMSTRONG - LEWIS CREEK	1,115	1,752,520	\$ 35,752.50	\$ 42,945.50	\$ 78,698.00	\$ 1,228.50	\$ -	\$ 574,529.30
17 KI-ARMSTRONG - MIDWAY	3,405	14,875,711	\$ 210,000.00	\$ 364,529.30	\$ 574,529.30	\$ 94.50	\$ -	\$ 21,888.24
18 KI-DOMTAR PAPER CO.	20,000	8,179.50	\$ 8,179.50	\$ 13,614.24	\$ 21,793.74	\$ -	\$ -	\$ 5,534.57
19 KI-DOTIKI #4	779	555,570	\$ 3,570.00	\$ 1,964.57	\$ 5,534.57	\$ -	\$ -	\$ 36,361.66
20 KI-HOPKINS CO. COAL	340	80,170	\$ 21,010.50	\$ 15,351.16	\$ 36,361.66	\$ -	\$ -	\$ 1,041,337.89
21 KI-KB ALLOYS, INC.	2,001	626,450	\$ 395,997.00	\$ 645,340.89	\$ 1,041,337.89	\$ -	\$ -	\$ 2,368.74
22 KI-KIMBERLY-CLARK	37,714	26,335,070	\$ 1,291.50	\$ 1,077.24	\$ 2,368.74	\$ -	\$ -	\$ 51,398.43
23 KI-SEBREE MINING - KMMC, LL	123	43,960	\$ 34,650.00	\$ 16,748.43	\$ 51,398.43	\$ 409.50	\$ -	\$ 76,859.33
24 KI-PATRIOT COAL, LP	3,300	683,470	\$ 36,676.50	\$ 39,773.33	\$ 76,449.83	\$ -	\$ -	\$ 189,387.42
25 KI-PRECOAT (ROLL COATER)	3,493	1,623,070	\$ 75,967.50	\$ 113,419.92	\$ 189,387.42	\$ -	\$ -	\$ 288,078.19
26 KI-SOUTHWIRE CO.	7,235	4,628,440	\$ 125,401.50	\$ 162,676.69	\$ 288,078.19	\$ 3,612.00	\$ -	\$ 44,402.20
27 KI-TYSON FOODS	11,943	6,638,510	\$ 19,624.50	\$ 21,165.70	\$ 40,790.20	\$ -	\$ -	\$ -
28 KI-VALLEY GRAIN	1,869	863,730	\$ 19,624.50	\$ 21,165.70	\$ 40,790.20	\$ -	\$ -	\$ -
29	143,464	84,381,211	\$ 1,506,372.00	\$ 2,067,761.58	\$ 3,574,133.58	\$ 16,549.08	\$ -	\$ 3,590,682.66
30 SUBTOTAL INDUSTRIALS								\$ 24,734.07
31	1,901	194,800	\$ 19,960.50	\$ 4,773.57	\$ 24,734.07	\$ -	\$ -	\$ 3,615,416.73
32 JPI-SHELL OIL								\$ 16,549.08
33	145,365	84,576,011	\$ 1,526,332.50	\$ 2,072,535.15	\$ 3,598,867.65	\$ 16,549.08	\$ -	\$ -
34 TOTAL INDUSTRIALS								\$ 16,504,037.84
35	678,546	347,671,303	\$ 6,591,552.00	\$ 9,895,936.76	\$ 16,487,488.76	\$ 16,549.08	\$ -	\$ -
36 GRAND TOTAL								\$ -

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

July 2012

	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FAC \$	FUEL MILLS/KWH	ES \$	ES MILLS/KWH	US \$
1 JULY 2012							
2	\$ 15.16	\$ 3,775,497.78	\$ 231,005.25	2.97	\$ 159,783.17	2.06	\$ (325,708.85)
3 JP RURALS	\$ -	\$ 6,686,588.74	\$ 404,340.87	2.97	\$ 279,677.04	2.05	\$ (570,105.66)
4 KENERGY RURALS	\$ -	\$ 2,426,549.75	\$ 146,309.98	2.97	\$ 101,200.61	2.05	\$ (206,291.66)
5 MEADE CO. RURALS							
6	\$ 15.16	\$ 12,888,636.27	\$ 781,656.10	2.97	\$ 540,660.82	2.05	\$ (1,102,106.17)
7 TOTAL RURALS							
8		\$ 118,337.65	\$ 7,312.58	2.97	\$ 5,058.01	2.05	\$ (10,310.47)
9 KI-ACCURIDE		\$ 3,993.58	\$ 215.58	2.97	\$ 149.11	2.05	\$ (303.95)
10 KI-ALCOA		\$ 669,277.83	\$ 47,242.94	2.97	\$ 32,677.29	2.05	\$ (66,610.80)
11 KI-ALERIS		\$ 124,879.47	\$ 6,691.38	2.97	\$ 4,628.34	2.06	\$ (9,434.60)
12 KI-SEBREE MINING STEAMPOR		\$ -	\$ -	0.00	\$ -	0.00	\$ -
13 KI-ARMSTRONG - BIG RUN		\$ 167,645.75	\$ 9,364.08	2.97	\$ 6,477.00	2.05	\$ (13,203.00)
14 KI-ARMSTRONG - DOCK		\$ 75,304.14	\$ 4,567.97	2.97	\$ 3,159.60	2.05	\$ (6,440.67)
15 KI-ARMSTRONG - EQUALITY		\$ 19,171.77	\$ 884.53	2.97	\$ 611.81	2.06	\$ (1,247.15)
16 KI-ARMSTRONG - LEWIS CREEK		\$ 79,926.50	\$ 5,206.74	2.97	\$ 3,601.43	2.06	\$ (7,341.31)
17 KI-ARMSTRONG - MIDWAY		\$ 574,529.30	\$ 44,195.74	2.97	\$ 30,569.59	2.06	\$ (62,314.35)
18 KI-DOMTAR PAPER CO.		\$ 21,888.24	\$ 1,650.60	2.97	\$ 1,141.70	2.06	\$ (2,327.28)
19 KI-DOTIKI #4		\$ 5,534.57	\$ 238.19	2.97	\$ 164.75	2.05	\$ (335.83)
20 KI-HOPKINS CO. COAL		\$ 36,361.66	\$ 1,861.18	2.97	\$ 1,287.35	2.06	\$ (2,624.20)
21 KI-KB ALLOYS, INC.		\$ 1,041,337.89	\$ 78,241.49	2.97	\$ 54,118.57	2.06	\$ (110,317.61)
22 KI-KIMBERLY-CLARK		\$ 2,368.74	\$ 130.61	2.97	\$ 90.34	2.06	\$ (184.15)
23 KI-SEBREE MINING - KMMC, LL		\$ 51,398.43	\$ 2,030.59	2.97	\$ 1,404.53	2.05	\$ (2,863.06)
24 KI-PATRIOT COAL, LP		\$ 76,859.33	\$ 4,822.14	2.97	\$ 3,335.41	2.06	\$ (6,799.04)
25 KI-PRECOAT (ROLL COATER)		\$ 189,387.42	\$ 13,751.10	2.97	\$ 9,511.44	2.05	\$ (19,388.54)
26 KI-SOUTHWIRE CO.		\$ 288,078.19	\$ 19,723.01	2.97	\$ 13,642.14	2.06	\$ (27,808.72)
27 KI-TYSON FOODS		\$ 44,402.20	\$ 2,566.14	2.97	\$ 1,774.97	2.06	\$ (3,618.16)
28 KI-VALLEY GRAIN							
29		\$ 3,590,682.66	\$ 250,696.59	2.97	\$ 173,403.38	2.05	\$ (353,472.89)
30 SUBTOTAL INDUSTRIALS	\$ -	\$ -	\$ -	2.97	\$ 400.31	2.05	\$ (816.02)
31		\$ 24,734.07	\$ 578.75	2.97	\$ 173,803.69	2.05	\$ (354,288.91)
32 JPI-SHELL OIL							
33	\$ -	\$ 3,615,416.73	\$ 251,275.34	2.97	\$ 714,464.51	2.05	\$ (1,456,395.08)
34 TOTAL INDUSTRIALS							
35	\$ 15.16	\$ 16,504,053.00	\$ 1,032,931.44	2.97			
36 GRAND TOTAL							

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

July 2012

	US MILLS/ KWH	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	REVENUE \$ NET OF MRSM \$	REV NET OF MRSM MILLS/ KWH
1 JULY 2012									
2	(4.19)	\$ (80,941.26)	(1.04)	\$ 3,759,636.09	48.35	\$ (392,576.75)	(5.05)	\$ 3,367,059.34	43.30
3 JP RURALS	(4.19)	\$ (141,675.82)	(1.04)	\$ 6,658,825.17	48.93	\$ (687,148.12)	(5.05)	\$ 5,971,677.05	43.88
4 KENERGY RURALS	(4.19)	\$ (51,265.13)	(1.04)	\$ 2,416,503.55	49.07	\$ (248,643.25)	(5.05)	\$ 2,167,860.30	44.02
5 MEADE CO. RURALS									
6	(4.19)	\$ (273,882.21)	(1.04)	\$ 12,834,964.81	48.78	\$ (1,328,368.12)	(5.05)	\$ 11,506,596.69	43.74
7 TOTAL RURALS									
8	(4.19)	\$ (2,562.23)	(1.04)	\$ 117,835.54	47.87	\$ (12,427.20)	(5.05)	\$ 105,408.34	42.83
9 KI-ACCURIDE	(4.19)	\$ (75.53)	(1.04)	\$ 3,978.79	54.83	\$ (366.36)	(5.05)	\$ 3,612.43	49.79
10 KI-ALCOA	(4.19)	\$ (16,553.32)	(1.04)	\$ 666,033.94	41.89	\$ (80,285.96)	(5.05)	\$ 585,747.98	36.84
11 KI-ALERIS	(4.19)	\$ (2,344.57)	(1.04)	\$ 124,420.02	55.24	\$ (11,371.52)	(5.05)	\$ 113,048.50	50.19
12 KI-SEBREE MINING STEAMPOR	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00
13 KI-ARMSTRONG - BIG RUN	(4.19)	\$ (3,281.05)	(1.04)	\$ 167,002.78	52.99	\$ (15,913.58)	(5.05)	\$ 151,089.20	47.94
14 KI-ARMSTRONG - DOCK	(4.19)	\$ (1,600.56)	(1.04)	\$ 74,990.48	48.77	\$ (7,762.93)	(5.05)	\$ 67,227.55	43.72
15 KI-ARMSTRONG - EQUALITY	(4.19)	\$ (309.93)	(1.04)	\$ 19,111.03	64.19	\$ (1,503.19)	(5.05)	\$ 17,607.84	59.14
16 KI-ARMSTRONG - LEWIS CREEK	(4.19)	\$ (1,824.37)	(1.04)	\$ 79,568.99	45.40	\$ (8,848.47)	(5.05)	\$ 70,720.52	40.35
17 KI-ARMSTRONG - MIDWAY	(4.19)	\$ (15,485.62)	(1.04)	\$ 571,494.66	38.42	\$ (75,107.47)	(5.05)	\$ 496,387.19	33.37
18 KI-DOMTAR PAPER CO.	(4.19)	\$ (578.35)	(1.04)	\$ 21,774.91	39.19	\$ (2,805.08)	(5.05)	\$ 18,969.83	34.14
19 KI-DOTIKI #4	(4.19)	\$ (83.46)	(1.04)	\$ 5,518.22	68.83	\$ (404.79)	(5.05)	\$ 5,113.43	63.78
20 KI-HOPKINS CO. COAL	(4.19)	\$ (652.13)	(1.04)	\$ 36,233.86	57.84	\$ (3,162.94)	(5.05)	\$ 33,070.92	52.79
21 KI-KB ALLOYS, INC.	(4.19)	\$ (27,414.81)	(1.04)	\$ 1,035,965.53	39.34	\$ (132,965.76)	(5.05)	\$ 902,999.77	34.29
22 KI-KIMBERLY-CLARK	(4.19)	\$ (45.76)	(1.04)	\$ 2,359.78	53.68	\$ (221.96)	(5.05)	\$ 47,808.16	48.63
23 KI-SEBREE MINING - KMMC, LL	(4.19)	\$ (711.49)	(1.04)	\$ 51,259.00	75.00	\$ (3,450.84)	(5.05)	\$ 47,808.16	69.95
24 KI-PATRIOT COAL, LP	(4.19)	\$ (1,689.62)	(1.04)	\$ 76,528.22	47.15	\$ (8,194.88)	(5.05)	\$ 68,333.34	42.10
25 KI-PRECOAT (ROLL COATER)	(4.19)	\$ (4,818.21)	(1.04)	\$ 188,443.21	40.71	\$ (23,368.99)	(5.05)	\$ 165,074.22	35.67
26 KI-SOUTHWIRE CO.	(4.19)	\$ (6,910.69)	(1.04)	\$ 286,723.93	43.19	\$ (33,517.83)	(5.05)	\$ 253,206.10	38.14
27 KI-TYSON FOODS	(4.19)	\$ (899.14)	(1.04)	\$ 44,226.01	51.20	\$ (4,360.98)	(5.05)	\$ 39,865.03	46.15
28 KI-VALLEY GRAIN									
29	(4.19)	\$ (87,840.84)	(1.04)	\$ 3,573,468.90	42.35	\$ (426,040.73)	(5.05)	\$ 3,147,428.17	37.30
30 SUBTOTAL INDUSTRIALS									
31	(4.19)	\$ (202.79)	(1.04)	\$ 24,694.32	126.77	\$ (983.54)	(5.05)	\$ 23,710.78	121.72
32 JPI-SHELL OIL									
33	(4.19)	\$ (88,043.63)	(1.04)	\$ 3,598,163.22	42.54	\$ (427,024.27)	(5.05)	\$ 3,171,138.95	37.49
34 TOTAL INDUSTRIALS									
35	(4.19)	\$ (361,925.84)	(1.04)	\$ 16,433,128.03	47.27	\$ (1,755,392.39)	(5.05)	\$ 14,677,735.64	42.22
36 GRAND TOTAL									

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

August 2012

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (FPF) \$	ORDER BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$
1 AUGUST 2012								\$ 3,393,067.39
2	150,783	65,934,520	\$ 1,432,438.50	\$ 1,960,628.89	\$ 3,393,067.39		\$ -	\$ 5,930,703.86
3 JP RURALS	262,392	115,616,756	\$ 2,492,724.00	\$ 3,437,979.86	\$ 5,930,703.86		\$ -	\$ 2,122,440.17
4 KENERGY RURALS	93,777	41,416,420	\$ 890,881.50	\$ 1,231,558.67	\$ 2,122,440.17		\$ -	\$ -
5 MEADE CO. RURALS							\$ -	\$ 11,446,211.42
6	506,952	222,967,696	\$ 4,816,044.00	\$ 6,630,167.42	\$ 11,446,211.42	\$ -	\$ -	\$ -
7 TOTAL RURALS								\$ 114,108.98
8	5,368	2,356,457	\$ 56,364.00	\$ 57,744.98	\$ 114,108.98	\$ -	\$ -	\$ 5,589.03
9 KI-ACCURIDE	169	102,960	\$ 1,774.50	\$ 2,523.03	\$ 4,297.53	\$ 1,291.50	\$ -	\$ 659,752.08
10 KI-ALCOA	26,819	15,431,650	\$ 281,599.50	\$ 378,152.58	\$ 659,752.08	\$ -	\$ -	\$ 145,984.48
11 KI-ALERIS	7,154	2,891,960	\$ 75,117.00	\$ 70,867.48	\$ 145,984.48	\$ -	\$ -	\$ -
12 KI-SEBREE MINING STEAMPORT (ALLIED)	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 180,447.15
13 KI-ARMSTRONG - BIG RUN	7,970	3,565,120	\$ 83,685.00	\$ 87,363.27	\$ 171,048.27	\$ 9,398.88	\$ -	\$ 78,275.71
14 KI-ARMSTRONG - DOCK	3,452	1,593,200	\$ 36,246.00	\$ 39,041.37	\$ 75,287.37	\$ 2,988.34	\$ -	\$ 18,548.06
15 KI-ARMSTRONG - EQUALITY	1,000	297,970	\$ 10,500.00	\$ 7,301.75	\$ 17,801.75	\$ 746.31	\$ -	\$ 80,462.59
16 KI-ARMSTRONG - LEWIS CREEK	3,330	1,807,390	\$ 34,965.00	\$ 44,290.09	\$ 79,255.09	\$ 1,207.50	\$ -	\$ 410,849.21
17 KI-ARMSTRONG - MIDWAY	15,000	10,338,674	\$ 157,500.00	\$ 253,349.21	\$ 410,849.21	\$ -	\$ -	\$ 21,621.90
18 KI-DOMTAR PAPER CO.	785	542,130	\$ 8,242.50	\$ 13,284.90	\$ 21,527.40	\$ 94.50	\$ -	\$ 6,794.37
19 KI-DOTIKI #4	340	131,580	\$ 3,570.00	\$ 3,224.37	\$ 6,794.37	\$ -	\$ -	\$ 38,027.75
20 KI-HOPKINS CO. COAL	2,001	694,440	\$ 21,010.50	\$ 17,017.25	\$ 38,027.75	\$ -	\$ -	\$ 1,056,989.78
21 KI-KB ALLOYS, INC.	38,016	26,844,390	\$ 399,168.00	\$ 657,821.78	\$ 1,056,989.78	\$ -	\$ -	\$ -
22 KI-KIMBERLY-CLARK	139	46,810	\$ 1,459.50	\$ 1,147.08	\$ 2,606.58	\$ -	\$ -	\$ 2,606.58
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)	3,300	672,670	\$ 34,650.00	\$ 16,483.78	\$ 51,133.78	\$ -	\$ -	\$ 51,133.78
24 KI-PATRIOT COAL, LP	3,606	1,692,320	\$ 37,863.00	\$ 41,470.30	\$ 79,333.30	\$ 861.00	\$ -	\$ 80,194.30
25 KI-PRECOAT (ROLL COATER)	7,091	4,652,970	\$ 74,455.50	\$ 114,021.03	\$ 188,476.53	\$ -	\$ -	\$ 188,476.53
26 KI-SOUTHWIRE CO.	11,904	6,813,039	\$ 124,992.00	\$ 166,953.52	\$ 291,945.52	\$ 1,407.00	\$ -	\$ 293,352.52
27 KI-TYSON FOODS	2,189	1,026,560	\$ 22,984.50	\$ 25,155.85	\$ 48,140.35	\$ 3,885.00	\$ -	\$ 52,025.35
28 KI-VALLEY GRAIN								\$ 3,485,240.15
29	139,633	81,502,290	\$ 1,466,146.50	\$ 1,997,213.62	\$ 3,463,360.12	\$ 21,880.03	\$ -	\$ -
30 SUBTOTAL INDUSTRIALS								\$ 31,851.74
31	2,041	425,270	\$ 21,430.50	\$ 10,421.24	\$ 31,851.74	\$ -	\$ -	\$ -
32 JPI-SHELL OIL								\$ 3,517,091.89
33	141,674	81,927,560	\$ 1,487,577.00	\$ 2,007,634.86	\$ 3,495,211.86	\$ 21,880.03	\$ -	\$ -
34 TOTAL INDUSTRIALS								\$ 14,963,303.31
35	648,626	304,895,256	\$ 6,303,621.00	\$ 8,637,802.28	\$ 14,941,423.28	\$ 21,880.03	\$ -	\$ -
36 GRAND TOTAL								

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

August 2012

	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FAC \$	FUEL MILLS/KWH	ES \$	ES MILLS/KWH	US \$
1 AUGUST 2012						2.26	\$ (276,199.70)
2	\$ 15.16	\$ 3,393,082.55	\$ 236,704.93	3.59	\$ 149,077.95	2.26	\$ (484,318.59)
3 JP RURALS	\$ -	\$ 5,930,703.86	\$ 415,064.15	3.59	\$ 93,642.53	2.26	\$ (173,493.38)
4 KENERGY RURALS	\$ -	\$ 2,122,440.17	\$ 148,684.95				
5 MEADE CO. RURALS				3.59	\$ 504,129.97	2.26	\$ (934,011.67)
6	\$ 15.16	\$ 11,446,226.58	\$ 800,454.03				
7 TOTAL RURALS				3.59	\$ 5,327.95	2.26	\$ (9,871.20)
8		\$ 114,108.98	\$ 8,459.68	3.59	\$ 232.79	2.26	\$ (431.30)
9 KI-ACCURIDE		\$ 5,589.03	\$ 369.63	3.59	\$ 34,890.96	2.26	\$ (64,643.18)
10 KI-ALCOA		\$ 659,752.08	\$ 55,399.62				
11 KI-ALERIS		\$ 145,984.48	\$ 10,382.14	3.59	\$ 6,538.72	2.26	\$ (12,114.42)
12 KI-SEBREE MINING STEAMPORT (ALLIED)		\$ -	\$ -	0.00	\$ -	0.00	\$ -
13 KI-ARMSTRONG - BIG RUN		\$ 180,447.15	\$ 12,798.78	3.59	\$ 8,060.74	2.26	\$ (14,934.29)
14 KI-ARMSTRONG - DOCK		\$ 78,275.71	\$ 5,719.59	3.59	\$ 3,602.23	2.26	\$ (6,673.91)
15 KI-ARMSTRONG - EQUALITY		\$ 18,548.06	\$ 1,069.71	3.59	\$ 673.71	2.26	\$ (1,248.20)
16 KI-ARMSTRONG - LEWIS CREEK		\$ 80,462.59	\$ 6,488.53	3.59	\$ 4,086.51	2.26	\$ (7,571.16)
17 KI-ARMSTRONG - MIDWAY		\$ 410,849.21	\$ 37,115.84	3.59	\$ 23,375.74	2.26	\$ (43,308.71)
18 KI-DOMTAR PAPER CO.		\$ 21,621.90	\$ 1,946.25	3.59	\$ 1,225.76	2.26	\$ (2,270.98)
19 KI-DOTIKI #4		\$ 6,794.37	\$ 472.37	3.59	\$ 297.50	2.26	\$ (551.19)
20 KI-HOPKINS CO. COAL		\$ 38,027.75	\$ 2,493.04	3.59	\$ 1,570.13	2.26	\$ (2,909.01)
21 KI-KB ALLOYS, INC.		\$ 1,056,989.78	\$ 96,371.36	3.59	\$ 60,695.17	2.26	\$ (112,451.15)
22 KI-KIMBERLY-CLARK		\$ 2,606.58	\$ 168.05	3.59	\$ 105.84	2.26	\$ (196.09)
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)		\$ 51,133.78	\$ 2,414.89	3.59	\$ 1,520.91	2.26	\$ (2,817.81)
24 KI-PATRIOT COAL, LP		\$ 80,194.30	\$ 6,075.43	3.59	\$ 3,826.34	2.26	\$ (7,089.13)
25 KI-PRECOAT (ROLL COATER)		\$ 188,476.53	\$ 16,704.16	3.59	\$ 10,520.37	2.26	\$ (19,491.29)
26 KI-SOUTHWIRE CO.		\$ 293,352.52	\$ 24,458.81	3.59	\$ 15,404.28	2.26	\$ (28,539.82)
27 KI-TYSON FOODS		\$ 52,025.35	\$ 3,685.35	3.59	\$ 2,321.05	2.26	\$ (4,300.26)
28 KI-VALLEY GRAIN						2.26	\$ (341,413.10)
29	\$ -	\$ 3,485,240.15	\$ 292,593.23	3.59	\$ 184,276.70		
30 SUBTOTAL INDUSTRIALS		\$ 31,851.74	\$ 1,526.72	3.59	\$ 961.54	2.26	\$ (1,781.46)
31							
32 JPI-SHELL OIL		\$ 3,517,091.89	\$ 294,119.95	3.59	\$ 185,238.24	2.26	\$ (343,194.56)
33							
34 TOTAL INDUSTRIALS		\$ 3,517,091.89	\$ 294,119.95	3.59	\$ 185,238.24	2.26	\$ (343,194.56)
35	\$ 15.16	\$ 14,963,318.47	\$ 1,094,573.98	3.59	\$ 689,368.21	2.26	\$ (1,277,206.23)
36 GRAND TOTAL							

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

August 2012

	US MILLS/ KWH	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	REVENUE \$ NET OF MRSM \$	REV NET OF MRSM MILLS/ KWH
1 AUGUST 2012									
2	(4.19)	\$ (68,637.84)	(1.04)	\$ 3,434,027.89	52.08	\$ (387,299.38)	(5.87)	\$ 3,046,728.51	46.21
3 JP RURALS	(4.19)	\$ (120,357.04)	(1.04)	\$ 6,002,501.87	51.92	\$ (679,132.82)	(5.87)	\$ 5,323,369.05	46.04
4 KENERGY RURALS	(4.19)	\$ (43,114.49)	(1.04)	\$ 2,148,159.78	51.87	\$ (243,280.06)	(5.87)	\$ 1,904,879.72	45.99
5 MEADE CO. RURALS									
6	(4.19)	\$ (232,109.37)	(1.04)	\$ 11,584,689.54	51.96	\$ (1,309,712.26)	(5.87)	\$ 10,274,977.28	46.08
7 TOTAL RURALS									
8	(4.19)	\$ (2,453.07)	(1.04)	\$ 115,572.34	49.04	\$ (13,841.83)	(5.87)	\$ 101,730.51	43.17
9 KI-ACCURIDE	(4.19)	\$ (107.18)	(1.04)	\$ 5,652.97	54.90	\$ (604.79)	(5.87)	\$ 5,048.18	49.03
10 KI-ALCOA	(4.19)	\$ (16,064.35)	(1.04)	\$ 669,335.13	43.37	\$ (90,645.51)	(5.87)	\$ 578,689.62	37.50
11 KI-ALERIS	(4.19)	\$ (3,010.53)	(1.04)	\$ 147,780.39	51.10	\$ (16,987.38)	(5.87)	\$ 130,793.01	45.23
12 KI-SEBREE MINING STEAMPORT (ALLIED)	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00
13 KI-ARMSTRONG - BIG RUN	(4.19)	\$ (3,711.29)	(1.04)	\$ 182,661.09	51.24	\$ (20,941.52)	(5.87)	\$ 161,719.57	45.36
14 KI-ARMSTRONG - DOCK	(4.19)	\$ (1,658.52)	(1.04)	\$ 79,265.10	49.75	\$ (9,358.47)	(5.87)	\$ 69,906.63	43.88
15 KI-ARMSTRONG - EQUALITY									
16 KI-ARMSTRONG - LEWIS CREEK	(4.19)	\$ (310.19)	(1.04)	\$ 18,733.09	62.87	\$ (1,750.27)	(5.87)	\$ 16,982.82	57.00
17 KI-ARMSTRONG - MIDWAY	(4.19)	\$ (1,881.49)	(1.04)	\$ 81,584.98	45.14	\$ (10,616.61)	(5.87)	\$ 70,968.37	39.27
18 KI-DOMTAR PAPER CO.	(4.19)	\$ (10,762.56)	(1.04)	\$ 417,269.52	40.36	\$ (60,729.37)	(5.87)	\$ 356,540.15	34.49
19 KI-DOTIKI #4	(4.19)	\$ (564.36)	(1.04)	\$ 21,958.57	40.50	\$ (3,184.48)	(5.87)	\$ 18,774.09	34.63
20 KI-HOPKINS CO. COAL	(4.19)	\$ (136.97)	(1.04)	\$ 6,876.08	52.26	\$ (772.89)	(5.87)	\$ 6,103.19	46.38
21 KI-KB ALLOYS, INC.	(4.19)	\$ (722.91)	(1.04)	\$ 38,459.00	55.38	\$ (4,079.14)	(5.87)	\$ 34,379.86	49.51
22 KI-KIMBERLY-CLARK	(4.19)	\$ (27,945.01)	(1.04)	\$ 1,073,660.15	40.00	\$ (157,683.95)	(5.87)	\$ 915,976.20	34.12
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)	(4.19)	\$ (48.73)	(1.04)	\$ 2,635.65	56.31	\$ (274.96)	(5.87)	\$ 2,360.69	50.43
24 KI-PATRIOT COAL, LP	(4.19)	\$ (700.25)	(1.04)	\$ 51,551.52	76.64	\$ (3,951.28)	(5.87)	\$ 47,600.24	70.76
25 KI-PRECOAT (ROLL COATER)	(4.19)	\$ (1,761.71)	(1.04)	\$ 81,245.23	48.01	\$ (9,940.69)	(5.87)	\$ 71,304.54	42.13
26 KI-SOUTHWIRE CO.	(4.19)	\$ (4,843.74)	(1.04)	\$ 191,366.03	41.13	\$ (27,331.55)	(5.87)	\$ 164,034.48	35.25
27 KI-TYSON FOODS	(4.19)	\$ (7,092.37)	(1.04)	\$ 297,583.42	43.68	\$ (40,019.79)	(5.87)	\$ 257,563.63	37.80
28 KI-VALLEY GRAIN	(4.19)	\$ (1,068.65)	(1.04)	\$ 52,662.84	51.30	\$ (6,030.01)	(5.87)	\$ 46,632.83	45.43
29									
30 SUBTOTAL INDUSTRIALS	(4.19)	\$ (84,843.88)	(1.04)	\$ 3,535,853.10	43.38	\$ (478,744.49)	(5.87)	\$ 3,057,108.61	37.51
31	(4.19)	\$ (442.71)	(1.04)	\$ 32,115.83	75.52	\$ (2,498.04)	(5.87)	\$ 29,617.79	69.64
32 JPI-SHELL OIL	(4.19)	\$ (85,286.59)	(1.04)	\$ 3,567,968.93	43.55	\$ (481,242.53)	(5.87)	\$ 3,086,726.40	37.68
33									
34 TOTAL INDUSTRIALS	(4.19)	\$ (317,395.96)	(1.04)	\$ 15,152,658.47	49.70	\$ (1,790,954.79)	(5.87)	\$ 13,361,703.68	43.82
35									
36 GRAND TOTAL									

Case No. 2012-00555
Attachment for Response to Staff Item 12
Witness: Nicholas R. Castlen
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Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

September 2012

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (PFP) \$	ORDER BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$
1 SEPTEMBER 2012								\$ 2,716,406.82
2	130,745	49,580,620	\$ 1,242,077.50	\$ 1,474,329.32	\$ 2,716,406.82		\$ -	\$ 4,838,187.15
3 JP RURALS	231,637	88,701,764	\$ 2,200,551.50	\$ 2,637,635.65	\$ 4,838,187.15		\$ -	\$ 1,733,456.64
4 KENERGY RURALS	81,960	32,110,460	\$ 778,620.00	\$ 954,836.64	\$ 1,733,456.64			
5 MEADE CO. RURALS								\$ 9,288,050.61
6	444,342	170,392,844	\$ 4,221,249.00	\$ 5,066,801.61	\$ 9,288,050.61	\$ -	\$ -	\$ 105,385.07
7 TOTAL RURALS								\$ 5,607.96
8	5,103	2,114,000	\$ 53,581.50	\$ 51,803.57	\$ 105,385.07	\$ 1,291.50	\$ -	\$ 660,740.43
9 KI-ACCURIDE	161	107,160	\$ 1,690.50	\$ 2,625.96	\$ 4,316.46	\$ -	\$ -	\$ 134,587.54
10 KI-ALCOA	27,405	15,220,891	\$ 287,752.50	\$ 372,987.93	\$ 660,740.43	\$ -	\$ -	\$ -
11 KI-ALERIS				\$ 62,211.04	\$ 134,587.54	\$ -	\$ -	\$ 160,219.55
12 KI-SEBREE MINING STEAMPORT (ALLIED)	6,893	2,538,708	\$ 72,376.50	\$ -	\$ -	\$ -	\$ -	\$ 68,221.94
13 KI-ARMSTRONG - BIG RUN	-	-	\$ -	\$ 71,903.80	\$ 151,283.80	\$ 8,935.75	\$ -	\$ 19,120.26
14 KI-ARMSTRONG - DOCK	7,560	2,934,250	\$ 79,380.00	\$ 33,972.26	\$ 66,186.26	\$ 2,035.68	\$ -	\$ 94,960.33
15 KI-ARMSTRONG - EQUALITY	3,068	1,386,340	\$ 32,214.00	\$ -	\$ -	\$ -	\$ -	\$ 422,154.00
16 KI-ARMSTRONG - LEWIS CREEK	1,000	320,843	\$ 10,500.00	\$ 7,862.26	\$ 18,362.26	\$ 758.00	\$ -	\$ 19,195.17
17 KI-ARMSTRONG - MIDWAY	4,498	1,947,820	\$ 47,229.00	\$ 47,731.33	\$ 94,960.33	\$ -	\$ -	\$ 6,795.38
18 KI-DOMTAR PAPER CO.	15,000	10,800,000	\$ 157,500.00	\$ 264,654.00	\$ 422,154.00	\$ 94.50	\$ -	\$ 32,032.24
19 KI-DOTIKI #4	765	451,670	\$ 8,032.50	\$ 11,068.17	\$ 19,100.67	\$ -	\$ -	\$ 1,012,930.27
20 KI-HOPKINS CO. COAL	359	123,480	\$ 3,769.50	\$ 3,025.88	\$ 6,795.38	\$ -	\$ -	\$ 2,751.95
21 KI-KB ALLOYS, INC.	2,001	449,775	\$ 21,010.50	\$ 11,021.74	\$ 32,032.24	\$ -	\$ -	\$ 50,517.23
22 KI-KIMBERLY-CLARK	37,627	25,213,090	\$ 395,083.50	\$ 617,846.77	\$ 1,012,930.27	\$ -	\$ -	\$ 69,383.48
23 KI-SEBREE MINING - KMMC. LLC (KMMC. LLC)	164	42,030	\$ 1,722.00	\$ 1,029.95	\$ 2,751.95	\$ -	\$ -	\$ 186,050.58
24 KI-PATRIOT COAL LP	3,300	647,510	\$ 34,650.00	\$ 15,867.23	\$ 50,517.23	\$ 420.00	\$ -	\$ 267,148.74
25 KI-PRECOAT (ROLL COATER)	3,561	1,288,430	\$ 37,390.50	\$ 31,572.98	\$ 68,963.48	\$ -	\$ -	\$ 59,053.81
26 KI-SOUTHWIRE CO.	7,295	4,466,561	\$ 76,597.50	\$ 109,453.08	\$ 186,050.58	\$ -	\$ -	\$ 3,376,855.93
27 KI-TYSON FOODS	11,586	5,937,390	\$ 121,653.00	\$ 145,495.74	\$ 267,148.74	\$ 3,517.50	\$ -	\$ 34,235.39
28 KI-VALLEY GRAIN	2,404	1,236,250	\$ 25,242.00	\$ 30,294.31	\$ 55,536.31	\$ -	\$ -	\$ 3,411,091.32
29	139,750	77,226,198	\$ 1,467,375.00	\$ 1,892,428.00	\$ 3,359,803.00	\$ 17,052.93	\$ -	\$ 12,699,141.93
30 SUBTOTAL INDUSTRIALS								\$ 34,235.39
31	2,020	531,540	\$ 21,210.00	\$ 13,025.39	\$ 34,235.39	\$ -	\$ -	\$ 3,411,091.32
32 JPI-SHELL OIL								\$ 12,699,141.93
33	141,770	77,757,738	\$ 1,488,585.00	\$ 1,905,453.39	\$ 3,394,038.39	\$ 17,052.93	\$ -	\$ 12,699,141.93
34 TOTAL INDUSTRIALS								
35	586,112	248,150,582	\$ 5,709,834.00	\$ 6,972,255.00	\$ 12,682,089.00	\$ 17,052.93	\$ -	
36 GRAND TOTAL								

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

September 2012

	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FAC \$	FUEL MILLS/KWH	ES \$	ES MILLS/KWH	US \$
1 SEPTEMBER 2012							
2	\$ 15.16	\$ 2,716,421.98	\$ 164,508.50	3.32	\$ 102,978.95	2.08	\$ (207,693.22)
3 JP RURALS	\$ -	\$ 4,838,187.15	\$ 294,312.45	3.32	\$ 184,233.56	2.08	\$ (371,571.69)
4 KENERGY RURALS	\$ -	\$ 1,733,456.64	\$ 106,542.51	3.32	\$ 66,693.43	2.08	\$ (134,510.72)
5 MEADE CO. RURALS							
6	\$ 15.16	\$ 9,288,065.77	\$ 565,363.46	3.32	\$ 353,905.94	2.08	\$ (713,775.63)
7 TOTAL RURALS							
8		\$ 105,385.07	\$ 7,014.25	3.32	\$ 4,390.78	2.08	\$ (8,855.55)
9 KI-ACCURIDE		\$ 5,607.96	\$ 355.56	3.32	\$ 222.57	2.08	\$ (448.89)
10 KI-ALCOA		\$ 660,740.43	\$ 50,502.92	3.32	\$ 31,613.79	2.08	\$ (63,760.31)
11 KI-ALERIS		\$ 134,587.54	\$ 8,423.43	3.32	\$ 5,272.90	2.08	\$ (10,634.65)
12 KI-SEBREE MINING STEAMPORT (ALLIED)		\$ -	\$ -	0.00	\$ -	0.00	\$ -
13 KI-ARMSTRONG - BIG RUN		\$ 160,219.55	\$ 9,735.84	3.32	\$ 6,094.44	2.08	\$ (12,291.57)
14 KI-ARMSTRONG - DOCK		\$ 68,221.94	\$ 4,599.88	3.32	\$ 2,879.43	2.08	\$ (5,807.38)
15 KI-ARMSTRONG - EQUALITY		\$ 19,120.26	\$ 1,064.56	3.32	\$ 666.39	2.08	\$ (1,344.01)
16 KI-ARMSTRONG - LEWIS CREEK		\$ 94,960.33	\$ 6,462.87	3.32	\$ 4,045.62	2.08	\$ (8,159.42)
17 KI-ARMSTRONG - MIDWAY		\$ 422,154.00	\$ 35,834.40	3.32	\$ 22,431.60	2.08	\$ (45,241.20)
18 KI-DOMTAR PAPER CO.		\$ 19,195.17	\$ 1,498.64	3.32	\$ 938.12	2.08	\$ (1,892.05)
19 KI-DOTIKI #4		\$ 6,795.38	\$ 409.71	3.32	\$ 256.47	2.08	\$ (517.26)
20 KI-HOPKINS CO. COAL		\$ 32,032.24	\$ 1,492.35	3.32	\$ 934.18	2.08	\$ (1,884.11)
21 KI-KB ALLOYS, INC.		\$ 1,012,930.27	\$ 83,657.03	3.32	\$ 52,367.59	2.08	\$ (105,617.63)
22 KI-KIMBERLY-CLARK		\$ 2,751.95	\$ 139.46	3.32	\$ 87.30	2.08	\$ (176.06)
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)		\$ 50,517.23	\$ 2,148.44	3.32	\$ 1,344.88	2.08	\$ (2,712.42)
24 KI-PATRIOT COAL, LP		\$ 69,383.48	\$ 4,275.01	3.32	\$ 2,676.07	2.08	\$ (5,397.23)
25 KI-PRECOAT (ROLL COATER)		\$ 186,050.58	\$ 14,820.05	3.32	\$ 9,277.05	2.08	\$ (18,710.42)
26 KI-SOUTHWIRE CO.		\$ 267,148.74	\$ 19,700.26	3.32	\$ 12,331.96	2.08	\$ (24,871.73)
27 KI-TYSON FOODS		\$ 59,053.81	\$ 4,101.88	3.32	\$ 2,567.69	2.08	\$ (5,178.65)
28 KI-VALLEY GRAIN							
29	\$ -	\$ 3,376,855.93	\$ 256,236.54	3.32	\$ 160,398.83	2.08	\$ (323,500.54)
30 SUBTOTAL INDUSTRIALS		\$ 34,235.39	\$ 1,763.65	3.32	\$ 1,104.01	2.08	\$ (2,226.62)
31							
32 JPI-SHELL OIL		\$ 3,411,091.32	\$ 258,000.19	3.32	\$ 161,502.84	2.08	\$ (325,727.16)
33	\$ -	\$ -	\$ -				
34 TOTAL INDUSTRIALS		\$ 3,411,091.32	\$ 258,000.19	3.32	\$ 161,502.84	2.08	\$ (325,727.16)
35	\$ 15.16	\$ 12,699,157.09	\$ 823,363.65	3.32	\$ 515,408.78	2.08	\$ (1,039,502.79)
36 GRAND TOTAL							

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

September 2012

	US MILLS/ KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/ KWH	REVENUE \$	REVENUE MILLS/ KWH	MRSM \$	MRSM MILLS/ KWH	REVENUE \$ NET OF MRSM \$	REV NET OF MRSM MILLS/ KWH
1 SEPTEMBER 2012										
2						54.64	\$ (268,627.80)	(5.42)	\$ 2,440,307.50	49.22
3 JP RURALS	(4.19)	\$ (51,613.43)	\$ (15,667.48)	(1.04)	\$ 2,708,935.30	54.39	\$ (480,586.15)	(5.42)	\$ 4,344,207.02	48.98
4 KENERGY RURALS	(4.19)	\$ (92,338.54)	\$ (28,029.76)	(1.04)	\$ 4,824,793.17	53.83	\$ (173,974.48)	(5.42)	\$ 1,554,633.48	48.42
5 MEADE CO. RURALS	(4.19)	\$ (33,426.99)	\$ (10,146.91)	(1.04)	\$ 1,728,607.96					
6						54.36	\$ (923,188.43)	(5.42)	\$ 8,339,148.00	48.94
7 TOTAL RURALS	(4.19)	\$ (177,378.96)	\$ (53,844.15)	(1.04)	\$ 9,262,336.43					
8						49.70	\$ (11,453.65)	(5.42)	\$ 93,612.21	44.28
9 KI-ACCURIDE	(4.19)	\$ (2,200.67)	\$ (668.02)	(1.04)	\$ 105,065.86	52.18	\$ (580.60)	(5.42)	\$ 5,011.19	46.76
10 KI-ALCOA	(4.19)	\$ (111.55)	\$ (33.86)	(1.04)	\$ 5,591.79	43.26	\$ (82,466.79)	(5.42)	\$ 575,975.29	37.84
11 KI-ALERIS	(4.19)	\$ (15,844.95)	\$ (4,809.80)	(1.04)	\$ 658,442.08					
12 KI-SEBREE MINING STEAMPORT (ALLIED)	(4.19)	\$ (2,642.80)	\$ (802.23)	(1.04)	\$ 134,204.19	52.86	\$ (13,754.72)	(5.42)	\$ 120,449.47	47.45
13 KI-ARMSTRONG - BIG RUN	0.00	\$ -	\$ -	0.00	\$ -	-	\$ -	0.00	\$ -	0.00
14 KI-ARMSTRONG - DOCK	(4.19)	\$ (3,054.55)	\$ (927.22)	(1.04)	\$ 159,776.49	54.45	\$ (15,897.77)	(5.42)	\$ 143,878.72	49.03
15 KI-ARMSTRONG - EQUALITY	(4.19)	\$ (1,443.18)	\$ (438.08)	(1.04)	\$ 68,012.61	49.06	\$ (7,511.19)	(5.42)	\$ 60,501.42	43.64
16 KI-ARMSTRONG - LEWIS CREEK	(4.19)	\$ (334.00)	\$ (101.39)	(1.04)	\$ 19,071.81	59.44	\$ (1,738.33)	(5.42)	\$ 17,333.48	54.02
17 KI-ARMSTRONG - MIDWAY	(4.19)	\$ (2,027.68)	\$ (615.51)	(1.04)	\$ 94,666.21	48.60	\$ (10,553.29)	(5.42)	\$ 84,112.92	43.18
18 KI-DOMTAR PAPER CO.	(4.19)	\$ (11,242.80)	\$ (3,412.80)	(1.04)	\$ 420,523.20	38.94	\$ (58,514.40)	(5.42)	\$ 362,008.80	33.52
19 KI-DOTIKI #4	(4.19)	\$ (470.19)	\$ (142.73)	(1.04)	\$ 19,126.96	42.35	\$ (2,447.14)	(5.42)	\$ 16,679.82	36.93
20 KI-HOPKINS CO. COAL	(4.19)	\$ (128.54)	\$ (39.02)	(1.04)	\$ 6,776.74	54.88	\$ (669.02)	(5.42)	\$ 6,107.72	49.46
21 KI-KB ALLOYS, INC.	(4.19)	\$ (468.22)	\$ (142.13)	(1.04)	\$ 31,964.31	71.07	\$ (2,436.87)	(5.42)	\$ 29,527.44	65.65
22 KI-KIMBERLY-CLARK	(4.19)	\$ (26,246.83)	\$ (7,967.34)	(1.04)	\$ 1,009,123.09	40.02	\$ (136,604.53)	(5.42)	\$ 872,518.56	34.61
23 KI-SEBREE MINING - KMMC, LLC (KMMC, LLC)	(4.19)	\$ (43.75)	\$ (13.28)	(1.04)	\$ 2,745.62	65.33	\$ (227.73)	(5.42)	\$ 2,517.89	59.91
24 KI-PATRIOT COAL, LP	(4.19)	\$ (674.06)	\$ (204.61)	(1.04)	\$ 50,419.46	77.87	\$ (3,508.21)	(5.42)	\$ 46,911.25	72.45
25 KI-PRECOAT (ROLL COATER)	(4.19)	\$ (1,341.26)	\$ (407.14)	(1.04)	\$ 69,188.93	53.70	\$ (6,980.72)	(5.42)	\$ 62,208.21	48.28
26 KI-SOUTHWIRE CO.	(4.19)	\$ (4,649.69)	\$ (1,411.43)	(1.04)	\$ 185,376.14	41.50	\$ (24,199.83)	(5.42)	\$ 161,176.31	36.09
27 KI-TYSON FOODS	(4.19)	\$ (6,180.82)	\$ (1,876.22)	(1.04)	\$ 266,252.19	44.84	\$ (32,168.78)	(5.42)	\$ 234,083.41	39.43
28 KI-VALLEY GRAIN	(4.19)	\$ (1,286.94)	\$ (390.66)	(1.04)	\$ 58,867.13	47.62	\$ (6,698.01)	(5.42)	\$ 52,169.12	42.20
29						43.58	\$ (418,411.58)	(5.42)	\$ 2,946,783.23	38.16
30 SUBTOTAL INDUSTRIALS	(4.19)	\$ (80,392.48)	\$ (24,403.47)	(1.04)	\$ 3,365,194.81					
31						64.26	\$ (2,879.89)	(5.42)	\$ 31,275.24	58.84
32 JPI-SHELL OIL	(4.19)	\$ (553.33)	\$ (167.97)	(1.04)	\$ 34,155.13					
33						43.72	\$ (421,291.47)	(5.42)	\$ 2,978,058.47	38.30
34 TOTAL INDUSTRIALS	(4.19)	\$ (80,945.81)	\$ (24,571.44)	(1.04)	\$ 3,399,349.94					
35						51.02	\$ (1,344,479.90)	(5.42)	\$ 11,317,206.47	45.61
36 GRAND TOTAL	(4.19)	\$ (258,324.77)	\$ (78,415.59)	(1.04)	\$ 12,661,686.37					

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

October 2012

	KW BILLED	KWH	DEMAND \$	BASE ENERGY \$	DEMAND \$ AND ENERGY \$	POWER FACTOR PENALTY (FPF) \$	ORDER BILLING ADJ	DEMAND \$ ENERGY \$ AND PFP \$
1 OCTOBER 2012								
2								\$ 2,152,478.19
3 JP RURALS	87,541	44,418,842	\$ 831,639.50	\$ 1,320,838.69	\$ 2,152,478.19		\$ -	\$ 3,976,356.82
4 KENERGY RURALS	165,386	80,884,780	\$ 1,571,167.00	\$ 2,405,189.82	\$ 3,976,356.82		\$ -	\$ 1,610,213.61
5 MEADE CO. RURALS	69,934	31,807,930	\$ 664,373.00	\$ 945,840.61	\$ 1,610,213.61		\$ -	
6								\$ 7,739,048.62
7 TOTAL RURALS	322,861	157,111,552	\$ 3,067,179.50	\$ 4,671,869.12	\$ 7,739,048.62	\$ -	\$ -	
8								\$ 106,097.33
9 KI-ACCURIDE	5,020	2,178,630	\$ 52,710.00	\$ 53,387.33	\$ 106,097.33	\$ -	\$ -	\$ 5,766.14
10 KI-ALCOA	184	103,760	\$ 1,932.00	\$ 2,542.64	\$ 4,474.64	\$ 1,291.50	\$ -	\$ 649,367.40
11 KI-ALERIS	26,422	15,177,980	\$ 277,431.00	\$ 371,936.40	\$ 649,367.40	\$ -	\$ -	\$ 142,327.17
12 KI-SEBREE MINING STEAMPOR	7,027	2,797,130	\$ 73,783.50	\$ 68,543.67	\$ 142,327.17	\$ -	\$ -	\$ -
13 KI-ARMSTRONG - BIG RUN	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 179,663.08
14 KI-ARMSTRONG - DOCK	8,127	3,504,548	\$ 85,333.50	\$ 85,878.95	\$ 171,212.45	\$ 8,450.63	\$ -	\$ 74,123.86
15 KI-ARMSTRONG - EQUALITY	3,144	1,543,654	\$ 33,012.00	\$ 37,827.24	\$ 70,839.24	\$ 3,284.62	\$ -	\$ 20,337.36
16 KI-ARMSTRONG - LEWIS CREEK	1,000	363,729	\$ 10,500.00	\$ 8,913.18	\$ 19,413.18	\$ 924.18	\$ -	\$ 102,050.56
17 KI-ARMSTRONG - MIDWAY	4,697	2,151,890	\$ 49,318.50	\$ 52,732.06	\$ 102,050.56	\$ -	\$ -	\$ 430,975.80
18 KI-DOMTAR PAPER CO.	15,000	11,160,000	\$ 157,500.00	\$ 273,475.80	\$ 430,975.80	\$ -	\$ -	\$ 6,429.63
19 KI-DOTIKI #4	501	47,710	\$ 5,260.50	\$ 1,169.13	\$ 6,429.63	\$ -	\$ -	\$ 7,494.26
20 KI-HOPKINS CO. COAL	359	152,000	\$ 3,769.50	\$ 3,724.76	\$ 7,494.26	\$ -	\$ -	\$ 36,691.00
21 KI-KB ALLOYS, INC.	2,001	639,890	\$ 21,010.50	\$ 15,680.50	\$ 36,691.00	\$ -	\$ -	\$ 1,049,905.31
22 KI-KIMBERLY-CLARK	37,886	26,610,990	\$ 397,803.00	\$ 652,102.31	\$ 1,049,905.31	\$ -	\$ -	\$ 2,606.62
23 KI-SEBREE MINING - KMMC, LL	151	41,670	\$ 1,585.50	\$ 1,021.12	\$ 2,606.62	\$ -	\$ -	\$ 52,360.01
24 KI-PATRIOT COAL, LP	3,300	722,710	\$ 34,650.00	\$ 17,710.01	\$ 52,360.01	\$ -	\$ -	\$ 72,626.73
25 KI-PRECOAT (ROLL COATER)	3,561	1,437,920	\$ 37,390.50	\$ 35,236.23	\$ 72,626.73	\$ -	\$ -	\$ 185,035.00
26 KI-SOUTHWIRE CO.	7,099	4,509,100	\$ 74,539.50	\$ 110,495.50	\$ 185,035.00	\$ -	\$ -	\$ 267,196.01
27 KI-TYSON FOODS	10,848	6,255,540	\$ 113,904.00	\$ 153,292.01	\$ 267,196.01	\$ 3,318.00	\$ -	\$ 53,813.12
28 KI-VALLEY GRAIN	2,266	1,089,660	\$ 23,793.00	\$ 26,702.12	\$ 50,495.12	\$ -	\$ -	
29								\$ 3,444,866.39
30 SUBTOTAL INDUSTRIALS	138,593	80,488,511	\$ 1,455,226.50	\$ 1,972,370.96	\$ 3,427,597.46	\$ 17,268.93	\$ -	\$ 34,280.32
31								\$ 3,479,146.71
32 JPI-SHELL OIL	1,912	579,650	\$ 20,076.00	\$ 14,204.32	\$ 34,280.32	\$ -	\$ -	
33								\$ 3,479,146.71
34 TOTAL INDUSTRIALS	140,505	81,068,161	\$ 1,475,302.50	\$ 1,986,575.28	\$ 3,461,877.78	\$ 17,268.93	\$ -	
35								\$ 11,218,195.33
36								
37 GRAND TOTAL	463,366	238,179,713	\$ 4,542,482.00	\$ 6,658,444.40	\$ 11,200,926.40	\$ 17,268.93	\$ -	

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

October 2012

	GREEN POWER \$	DEMAND \$ ENERGY \$ PFP \$ AND GREEN POWER \$	FAC \$	FUEL MILLS/KWH	ES \$	ES MILLS/KWH	US \$
1 OCTOBER 2012							
2				3.31	\$ 124,094.21	2.79	\$ (186,070.53)
3 JP RURALS	\$ 15.16	\$ 2,152,493.35	\$ 147,159.62	3.31	\$ 229,117.06	2.83	\$ (338,826.34)
4 KENERGY RURALS	\$ -	\$ 3,976,356.82	\$ 267,971.28	3.31	\$ 92,677.70	2.91	\$ (133,243.42)
5 MEADE CO. RURALS	\$ -	\$ 1,610,213.61	\$ 105,379.67				
6				3.31	\$ 445,888.97	2.84	\$ (658,140.29)
7 TOTAL RURALS	\$ 15.16	\$ 7,739,063.78	\$ 520,510.57				
8		\$ 106,097.33	\$ 7,217.80	3.31	\$ 6,115.53	2.81	\$ (9,126.28)
9 KI-ACCURIDE		\$ 5,766.14	\$ 343.76	3.31	\$ 259.21	2.50	\$ (434.65)
10 KI-ALCOA		\$ 649,367.40	\$ 50,284.65	3.31	\$ 37,629.86	2.48	\$ (63,580.56)
11 KI-ALERIS		\$ 142,327.17	\$ 9,266.89	3.31	\$ 8,190.25	2.93	\$ (11,717.18)
12 KI-SEBREE MINING STEAMPOR		\$ -	\$ -	0.00	\$ -	0.00	\$ -
13 KI-ARMSTRONG - BIG RUN		\$ 179,663.08	\$ 11,610.57	3.31	\$ 9,867.60	2.82	\$ (14,680.55)
14 KI-ARMSTRONG - DOCK		\$ 74,123.86	\$ 5,114.13	3.31	\$ 4,092.88	2.65	\$ (6,466.37)
15 KI-ARMSTRONG - EQUALITY		\$ 20,337.36	\$ 1,205.03	3.31	\$ 1,115.21	3.07	\$ (1,523.66)
16 KI-ARMSTRONG - LEWIS CREEK		\$ 102,050.56	\$ 7,129.21	3.31	\$ 5,888.38	2.74	\$ (9,014.27)
17 KI-ARMSTRONG - MIDWAY		\$ 430,975.80	\$ 36,973.08	3.31	\$ 25,092.18	2.25	\$ (46,749.24)
18 KI-DOMTAR PAPER CO.		\$ 6,429.63	\$ 158.06	3.31	\$ 361.47	7.58	\$ (199.86)
19 KI-DOTIKI #4		\$ 7,494.26	\$ 503.58	3.31	\$ 431.77	2.84	\$ (636.73)
20 KI-HOPKINS CO. COAL		\$ 36,691.00	\$ 2,119.96	3.31	\$ 2,102.59	3.29	\$ (2,680.50)
21 KI-KB ALLOYS, INC.		\$ 1,049,905.31	\$ 88,162.21	3.31	\$ 61,064.91	2.29	\$ (111,473.44)
22 KI-KIMBERLY-CLARK		\$ 2,606.62	\$ 138.05	3.31	\$ 148.96	3.57	\$ (174.56)
23 KI-SEBREE MINING - KMMC, LL		\$ 52,360.01	\$ 2,394.34	3.31	\$ 2,979.87	4.12	\$ (3,027.43)
24 KI-PATRIOT COAL, LP		\$ 72,626.73	\$ 4,763.83	3.31	\$ 4,180.47	2.91	\$ (6,023.45)
25 KI-PRECOAT (ROLL COATER)		\$ 185,035.00	\$ 14,938.65	3.31	\$ 10,742.46	2.38	\$ (18,888.62)
26 KI-SOUTHWIRE CO.		\$ 267,196.01	\$ 20,724.60	3.31	\$ 15,484.72	2.48	\$ (26,204.46)
27 KI-TYSON FOODS		\$ 53,813.12	\$ 3,610.04	3.31	\$ 2,916.30	2.68	\$ (4,564.59)
28 KI-VALLEY GRAIN				3.31	\$ 198,664.62	2.47	\$ (337,166.40)
29		\$ 3,444,866.39	\$ 266,658.44				
30 SUBTOTAL INDUSTRIALS	\$ -	\$ -	\$ -	3.31	\$ 1,962.47	3.39	\$ (2,428.15)
31		\$ 34,280.32	\$ 1,920.38				
32 JPI-SHELL OIL		\$ 3,479,146.71	\$ 268,578.82	3.31	\$ 200,627.09	2.47	\$ (339,594.55)
33							
34 TOTAL INDUSTRIALS				3.31	\$ 646,516.06	2.71	\$ (997,734.84)
35							
36	\$ 15.16	\$ 11,218,210.49	\$ 789,089.39				
37 GRAND TOTAL							

Big Rivers Electric Corporation

Monthly Billing Summary

Electric Utility Sales

October 2012

	US MILLS/KWH	NON SMELTER NON FAC PPA	NON SMELTER NON FAC PPA	NSNFPPA MILLS/KWH	REVENUE \$	REVENUE MILLS/KWH	MRSM \$	MRSM MILLS/KWH	REVENUE \$ NET OF MRSM \$	REV NET OF MRSM MILLS/KWH
1 OCTOBER 2012										
2	(4.19)	\$ (46,240.01)	\$ (14,036.35)	(1.04)	\$ 2,177,400.29	49.02	\$ (272,275.46)	(6.13)	\$ 1,905,124.83	42.89
3 JP RURALS	(4.19)	\$ (84,201.06)	\$ (25,559.59)	(1.04)	\$ 4,024,858.17	49.76	\$ (498,948.69)	(6.17)	\$ 3,525,909.48	43.59
4 KENERGY RURALS	(4.19)	\$ (33,112.06)	\$ (10,051.31)	(1.04)	\$ 1,631,864.19	51.30	\$ (198,788.95)	(6.25)	\$ 1,433,075.24	45.05
5 MEADE CO. RURALS										
6	(4.19)	\$ (163,553.13)	\$ (49,647.25)	(1.04)	\$ 7,834,122.65	49.86	\$ (970,013.10)	(6.17)	\$ 6,864,109.55	43.69
7 TOTAL RURALS										
8	(4.19)	\$ (2,267.95)	\$ (688.45)	(1.04)	\$ 107,347.98	49.27	\$ (13,383.44)	(6.14)	\$ 93,964.54	43.13
9 KI-ACCURIDE	(4.19)	\$ (108.01)	\$ (32.79)	(1.04)	\$ 5,793.66	55.84	\$ (605.36)	(5.83)	\$ 5,188.30	50.00
10 KI-ALCOA	(4.19)	\$ (15,800.28)	\$ (4,796.24)	(1.04)	\$ 653,104.83	43.03	\$ (88,263.60)	(5.82)	\$ 564,841.23	37.21
11 KI-ALERIS	(4.19)	\$ (2,911.81)	\$ (883.89)	(1.04)	\$ 144,271.43	51.58	\$ (17,521.47)	(6.26)	\$ 126,749.96	45.31
12 KI-SEBREE MINING STEAMPOR	0.00	\$ -	\$ -	0.00	\$ -	-	\$ -	0.00	\$ -	0.00
13 KI-ARMSTRONG - BIG RUN	(4.19)	\$ (3,648.23)	\$ (1,107.44)	(1.04)	\$ 181,705.03	51.85	\$ (21,558.77)	(6.15)	\$ 160,146.26	45.70
14 KI-ARMSTRONG - DOCK	(4.19)	\$ (1,606.94)	\$ (487.79)	(1.04)	\$ 74,769.77	48.44	\$ (9,242.51)	(5.99)	\$ 65,527.26	42.45
15 KI-ARMSTRONG - EQUALITY	(4.19)	\$ (378.64)	\$ (114.94)	(1.04)	\$ 20,640.36	56.75	\$ (2,328.61)	(6.40)	\$ 18,311.75	50.34
16 KI-ARMSTRONG - LEWIS CREEK	(4.19)	\$ (2,240.12)	\$ (680.00)	(1.04)	\$ 103,133.76	47.93	\$ (13,067.08)	(6.07)	\$ 90,066.68	41.85
17 KI-ARMSTRONG - MIDWAY	(4.19)	\$ (11,617.56)	\$ (3,526.56)	(1.04)	\$ 431,147.70	38.63	\$ (62,321.94)	(5.58)	\$ 368,825.76	33.05
18 KI-DOMTAR PAPER CO.	(4.19)	\$ (49.67)	\$ (15.08)	(1.04)	\$ 7,586.62	140.11	\$ (520.62)	(10.91)	\$ 6,163.93	129.20
19 KI-DOTIKI #4	(4.19)	\$ (158.23)	\$ (48.03)	(1.04)	\$ 6,684.55	49.91	\$ (938.84)	(6.18)	\$ 6,647.78	43.74
20 KI-HOPKINS CO. COAL	(4.19)	\$ (666.13)	\$ (202.21)	(1.04)	\$ 37,364.71	58.39	\$ (4,237.27)	(6.62)	\$ 33,127.44	51.77
21 KI-KB ALLOYS, INC.	(4.19)	\$ (27,702.04)	\$ (8,409.07)	(1.04)	\$ 1,051,547.88	39.52	\$ (149,839.17)	(5.63)	\$ 901,708.71	33.88
22 KI-KIMBERLY-CLARK	(4.19)	\$ (43.38)	\$ (13.17)	(1.04)	\$ 2,662.52	63.90	\$ (287.96)	(6.91)	\$ 2,374.56	56.98
23 KI-SEBREE MINING - KMMC, LL	(4.19)	\$ (752.34)	\$ (228.38)	(1.04)	\$ 53,726.07	74.34	\$ (5,390.83)	(7.46)	\$ 48,335.24	66.88
24 KI-PATRIOT COAL, LP	(4.19)	\$ (1,496.87)	\$ (454.38)	(1.04)	\$ 73,596.33	51.18	\$ (8,977.37)	(6.24)	\$ 64,618.96	44.94
25 KI-PRECOAT (ROLL COATER)	(4.19)	\$ (4,693.97)	\$ (1,424.88)	(1.04)	\$ 185,708.64	41.19	\$ (25,784.82)	(5.72)	\$ 159,923.82	35.47
26 KI-SOUTHWIRE CO.	(4.19)	\$ (6,512.02)	\$ (1,976.75)	(1.04)	\$ 268,712.10	42.96	\$ (36,353.19)	(5.81)	\$ 232,358.91	37.14
27 KI-TYSON FOODS	(4.19)	\$ (1,134.34)	\$ (344.33)	(1.04)	\$ 54,296.20	49.83	\$ (6,551.40)	(6.01)	\$ 47,744.80	43.82
28 KI-VALLEY GRAIN										
29	(4.19)	\$ (83,788.53)	\$ (25,434.38)	(1.04)	\$ 3,463,800.14	43.03	\$ (467,174.25)	(5.80)	\$ 2,996,625.89	37.23
30 SUBTOTAL INDUSTRIALS										
31	(4.19)	\$ (603.42)	\$ (183.17)	(1.04)	\$ 34,948.43	60.29	\$ (3,896.19)	(6.72)	\$ 31,052.24	53.57
32 JPL-SHELL OIL										
33	(4.19)	\$ (84,391.95)	\$ (25,617.55)	(1.04)	\$ 3,498,748.57	43.16	\$ (471,070.44)	(5.81)	\$ 3,027,678.13	37.35
34 TOTAL INDUSTRIALS										
35	(4.19)	\$ (247,945.08)	\$ (75,264.80)	(1.04)	\$ 11,332,871.22	47.58	\$ (1,441,083.54)	(6.05)	\$ 9,891,787.68	41.53
36										
37 GRAND TOTAL										

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

May 2012

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
1						
2						
3						
4	BASE MONTHLY ENERGY -		2,104,920	-	360,309,427	48.40
5	CENTURY ALUMINUM	358,019,507	185,000	-	273,472,632	48.53
6	(Special Contract)		1,365,658	-	633,782,059	
7	ALCAN RIO TINTO	272,106,974	3,470,578	-		
8	(Special Contract)	630,126,481				
9	BASE FIXED ENERGY	351,435,840				
10	CENTURY ALUMINUM	268,316,160				
11	(Special Contract)	619,752,000				
12	ALCAN RIO TINTO					
13	(Special Contract)					
14						
15						
16	BASE VARIABLE ENERGY	6,583,667				
17	CENTURY ALUMINUM	3,790,814				
18	(Special Contract)	10,374,481				
19	ALCAN RIO TINTO					
20	(Special Contract)					
21						
22						
23						
24	CENTURY ALUMINUM					
25	(Special Contract)					
26	ALCAN RIO TINTO					
27	(Special Contract)					
28	CENTURY ALUMINUM					
29	(Special Contract)					
30	ALCAN RIO TINTO					
31	TOTAL CENTURY/ ALCAN RIO TINTO					
	BALANCE AS SHOWN ON OPERATING REPORT					

	TIER ADJ	CREDIT SURPLUS	BACKUP ENERGY	Supplemental
\$	1,020,014.18	\$	69,523.23	\$ 5,449.03
\$	778,766.02	\$	46,538.93	\$
\$	1,798,780.20	\$	116,062.16	\$ 5,449.03

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

May 2012

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC.ES.	
	AMT	MILLS	AMT	MILLS	AMT	MILLS		NONFAC PPA.	
								SURCHARGE	
1									
2									
3									
4	BASE MONTHLY ENERGY -								
5	CENTURY ALUMINUM	\$ 1,190,772.88	3.33	\$ 687,755.47	1.92	\$ (174,355.50)	(0.49)	\$ 653,271.01	\$ 2,357,443.86
6	(Special Contract)							\$ 498,764.39	\$ 1,793,993.59
7	ALCAN RIO TINTO	\$ 905,027.80	3.33	\$ 522,717.50	1.92	\$ (132,516.10)	(0.49)	\$ 1,152,035.40	\$ 4,151,437.45
8	(Special Contract)								
9		<u>\$ 2,095,800.68</u>		<u>\$ 1,210,472.97</u>		<u>\$ (306,871.60)</u>			
10	BASE FIXED ENERGY								\$ 13,843,760.61
11	CENTURY ALUMINUM								\$ 10,569,510.17
12	(Special Contract)								
13	ALCAN RIO TINTO								
14	(Special Contract)								
15									\$ 143,563.45
16	BASE VARIABLE ENERGY								\$ 82,662.50
17	CENTURY ALUMINUM								
18	(Special Contract)								
19	ALCAN RIO TINTO								
20	(Special Contract)								
21									\$ 1,094,986.44
22									\$ 825,304.95
23	CENTURY ALUMINUM								\$ 17,439,754.36
24	(Special Contract)								\$ 13,271,471.21
25	ALCAN RIO TINTO								\$ 30,711,225.57
26	(Special Contract)								
27									\$ 30,711,225.57
28	TOTAL CENTURY/								
29	ALCAN RIO TINTO								<u>\$ 30,711,225.57</u>
30									
31	BALANCE AS SHOWN ON								
	OPERATING REPORT								

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

June 2012

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
1						
2						
3						
4	BASE MONTHLY ENERGY -					
5	CENTURY ALUMINUM (Special Contract)	346,750,429	32,000	2,735,984	-	349,518,413
6	ALCAN RIO TINTO (Special Contract)	260,488,611	-	399,991	-	260,888,602
7		<u>607,239,040</u>	<u>-</u>	<u>3,135,975</u>	<u>-</u>	<u>610,407,015</u>
8						
9	BASE FIXED ENERGY					
10	CENTURY ALUMINUM (Special Contract)	340,099,200				
11	ALCAN RIO TINTO (Special Contract)	<u>259,660,800</u>				
12		<u>599,760,000</u>				
13						
14						
15						
16	BASE VARIABLE ENERGY					
17	CENTURY ALUMINUM (Special Contract)	6,651,229				
18	ALCAN RIO TINTO (Special Contract)	<u>827,811</u>				
19		<u>7,479,040</u>				
20						
21						
22						
23						
24	CENTURY ALUMINUM (Special Contract)			\$ 1,020,014.18	\$ -	\$ 92,319.11
25	ALCAN RIO TINTO (Special Contract)			\$ 778,766.02	\$ -	\$ 12,986.20
26				<u>\$ 1,798,780.20</u>	<u>\$ -</u>	<u>\$ 105,305.31</u>
27	CENTURY ALUMINUM (Special Contract)					\$ 1,085.80
28	ALCAN RIO TINTO (Special Contract)					-
29	TOTAL CENTURY/ ALCAN RIO TINTO					<u>\$ 1,085.80</u>
30						
31	BALANCE AS SHOWN ON OPERATING REPORT					

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

June 2012

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC.ES. NONFAC PPA. SURCHARGE
	AMT	MILLS	AMT	MILLS	AMT	MILLS		
1								
2								
3								
4	BASE MONTHLY ENERGY -							
5								
6								
7								
8								
9	BASE FIXED ENERGY							
10								
11								
12								
13								
14								
15								
16	BASE VARIABLE ENERGY							
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

July 2012

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
1						
2						
3						
4	BASE MONTHLY ENERGY -					
5	CENTURY ALUMINUM (Special Contract)	358,164,250	2,573,491	-	360,737,741	48.32
6	ALCAN RIO TINTO (Special Contract)	268,320,610	178,622	-	268,499,232	48.70
7		<u>626,484,860</u>	<u>2,752,113</u>	<u>-</u>	<u>629,236,973</u>	
8						
9	BASE FIXED ENERGY					
10	CENTURY ALUMINUM (Special Contract)	351,435,840				
11	ALCAN RIO TINTO (Special Contract)	<u>268,316,160</u>				
12		<u>619,752,000</u>				
13						
14						
15						
16	BASE VARIABLE ENERGY					
17	CENTURY ALUMINUM (Special Contract)	6,728,410				
18	ALCAN RIO TINTO (Special Contract)	<u>4,450</u>				
19		<u>6,732,860</u>				
20						
21						
22						
23						
24	CENTURY ALUMINUM (Special Contract)			\$ 1,020,014.18	\$ -	\$ 138,799.45
25	ALCAN RIO TINTO (Special Contract)			\$ 778,766.02	\$ -	\$ 8,707.93
26				<u>\$ 1,798,780.20</u>	<u>\$ -</u>	<u>\$ 147,507.38</u>
27	CENTURY ALUMINUM (Special Contract)					
28	ALCAN RIO TINTO (Special Contract)					
29	TOTAL CENTURY/ ALCAN RIO TINTO					
30						
31	BALANCE AS SHOWN ON OPERATING REPORT					

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

July 2012

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC,ES, NONFAC PPA, SURCHARGE
	AMT	MILLS	AMT	MILLS	AMT	MILLS		
1								
2								
3								
4	BASE MONTHLY ENERGY -							
5								
6								
7								
8								
9	BASE FIXED ENERGY							
10								
11								
12								
13								
14								
15								
16	BASE VARIABLE ENERGY							
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								

Big Rivers Electric Corporation Monthly Billing Summary Smelters August 2012

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
1						
2					359,098,790	49.26
3			1,525,097			
4	BASE MONTHLY ENERGY -					
5	CENTURY ALUMINUM (Special Contract)	357,573,693		(883,386)	262,775,146	50.14
6	ALCAN RIO TINTO (Special Contract)	263,628,400	30,132	(883,386)	621,873,936	
7		<u>621,202,093</u>	<u>1,555,229</u>			
8						
9	BASE FIXED ENERGY					
10	CENTURY ALUMINUM (Special Contract)	351,435,840				
11	ALCAN RIO TINTO (Special Contract)	<u>268,316,160</u>				
12		<u>619,752,000</u>				
13						
14						
15	BASE VARIABLE ENERGY					
16	CENTURY ALUMINUM (Special Contract)	6,137,853				
17	ALCAN RIO TINTO (Special Contract)	<u>(4,687,760)</u>				
18		<u>1,450,093</u>				
19						
20						
21						
22						
23						
24	CENTURY ALUMINUM (Special Contract)					
25	ALCAN RIO TINTO (Special Contract)					
26						
27	CENTURY ALUMINUM (Special Contract)					
28	ALCAN RIO TINTO (Special Contract)					
29	TOTAL CENTURY/ALCAN RIO TINTO					
30	BALANCE AS SHOWN ON					
31	OPERATING REPORT					

	TIER ADJ	CREDIT SURPLUS	BACKUP ENERGY	Supplemental
			\$ 56,744.07	\$ -
	\$ 1,020,014.18	\$ -	\$ 1,674.25	\$ -
	\$ 778,766.02	\$ (31,370.64)	\$ 58,418.32	\$ -
	<u>\$ 1,798,780.20</u>	<u>\$ (31,370.64)</u>		

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

August 2012

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC.ES.				
	AMT	MILLS	AMT	MILLS	AMT	MILLS		NONFAC PPA. SURCHARGE				
1												
2												
3												
4	BASE MONTHLY ENERGY -											
5												
	CENTURY ALUMINUM		\$	808,474.12	2.26	\$	(111,562.99)	(0.31)	\$	653,271.01	\$	2,633,871.70
	(Special Contract)	\$	1,283,689.56	3.59							\$	1,959,002.10
6	ALCAN RIO TINTO		\$	596,063.81	2.26	\$	(82,252.06)	(0.31)	\$	498,764.39	\$	4,592,873.80
	(Special Contract)	\$	946,425.96	3.59	\$	596,063.81	2.26	\$	(82,252.06)	(0.31)	\$	4,592,873.80
7		\$	2,230,115.52		\$	1,404,537.93		\$	1,152,035.40		\$	
8												
9	BASE FIXED ENERGY											
10	CENTURY ALUMINUM										\$	13,843,760.61
	(Special Contract)										\$	10,569,510.17
11	ALCAN RIO TINTO											
	(Special Contract)											
12												
13												
14												
15												
16	BASE VARIABLE ENERGY											
17	CENTURY ALUMINUM										\$	133,842.02
	(Special Contract)										\$	(102,221.29)
18	ALCAN RIO TINTO											
	(Special Contract)											
19												
20												
21												
22												
23											\$	1,076,758.25
24	CENTURY ALUMINUM										\$	749,069.63
	(Special Contract)											
25	ALCAN RIO TINTO											
	(Special Contract)											
26											\$	17,688,232.58
27	CENTURY ALUMINUM										\$	13,175,360.61
	(Special Contract)											
28	ALCAN RIO TINTO										\$	30,863,593.19
	(Special Contract)											
29	TOTAL CENTURY/ ALCAN RIO TINTO										\$	30,863,593.19
30											\$	30,863,593.19
31	BALANCE AS SHOWN ON OPERATING REPORT											

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

September 2012

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
1						
2						
3						
4	BASE MONTHLY ENERGY -					
5	CENTURY ALUMINUM (Special Contract)	345,213,171	594,822	-	345,807,993	49
6	ALCAN RIO TINTO (Special Contract)	258,249,044	296,598	(1,609,798)	256,935,844	49
7		<u>603,462,215</u>	<u>891,420</u>	<u>(1,609,798)</u>	<u>602,743,837</u>	
8						
9	BASE FIXED ENERGY					
10	CENTURY ALUMINUM (Special Contract)	340,099,200				
11	ALCAN RIO TINTO (Special Contract)	259,660,800				
12		<u>599,760,000</u>				
13						
14						
15						
16	BASE VARIABLE ENERGY					
17	CENTURY ALUMINUM (Special Contract)	5,113,971				
18	ALCAN RIO TINTO (Special Contract)	(1,411,756)				
19		<u>3,702,215</u>				
20						
21						
22						
23						
24	CENTURY ALUMINUM (Special Contract)			\$ 1,020,014.18	\$ 20,173.10	\$ -
25	ALCAN RIO TINTO (Special Contract)			\$ 778,766.02	\$ 12,421.43	\$ -
26				<u>\$ 1,798,780.20</u>	<u>\$ 32,594.53</u>	<u>\$ -</u>
27	CENTURY ALUMINUM (Special Contract)					
28	ALCAN RIO TINTO (Special Contract)					
29	TOTAL CENTURY/ ALCAN RIO TINTO					
30	BALANCE AS SHOWN ON					
31	OPERATING REPORT					

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

September 2012

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC.ES.
	AMT	MILLS	AMT	MILLS	AMT	MILLS		NONFAC PPA, SURCHARGE
1								
2								
3								
4	BASE MONTHLY ENERGY -							
5								
	CENTURY ALUMINUM							\$ 2,305,665.81
	(Special Contract)							
6								
	ALCAN RIO TINTO							\$ 1,734,687.85
	(Special Contract)							
7								
8								
9	BASE FIXED ENERGY							
10								\$ 13,397,187.69
	CENTURY ALUMINUM							
	(Special Contract)							
11								\$ 10,228,558.23
	ALCAN RIO TINTO							
	(Special Contract)							
12								
13								
14								
15	BASE VARIABLE ENERGY							
16								\$ 111,515.26
	CENTURY ALUMINUM							
	(Special Contract)							
17								\$ (30,784.74)
	ALCAN RIO TINTO							
	(Special Contract)							
18								
19								
20								
21								
22								
23								\$ 1,040,187.28
24								\$ 736,022.89
	CENTURY ALUMINUM							
	(Special Contract)							
25								\$ 16,854,556.04
	ALCAN RIO TINTO							
	(Special Contract)							
26								\$ 12,668,484.23
27								\$ 29,523,040.27
	CENTURY ALUMINUM							
	(Special Contract)							
28								\$ 29,523,040.27
	ALCAN RIO TINTO							
	(Special Contract)							
29								\$ 29,523,040.27
	TOTAL CENTURY/ ALCAN RIO TINTO							
30								\$ 29,523,040.27
31	BALANCE AS SHOWN ON OPERATING REPORT							

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

October 2012

	kWh	PLUS SUPPLEMENTAL ENERGY	PLUS BACK UP ENERGY	LESS SALES	TOTAL KWH	REV \$ MILLS/KWH
1						
2						
3						
4	BASE MONTHLY ENERGY -				356,530,637	49
5	CENTURY ALUMINUM (Special Contract)	355,937,568	593,069	-		
6	ALCAN RIO TINTO (Special Contract)	268,666,846	175,394	-	268,842,240	49
7		624,604,414	768,463	-	625,372,877	
8						
9	BASE FIXED ENERGY					
10	CENTURY ALUMINUM (Special Contract)	351,435,840				
11	ALCAN RIO TINTO (Special Contract)	268,316,160				
12		619,752,000				
13						
14						
15						
16	BASE VARIABLE ENERGY					
17	CENTURY ALUMINUM (Special Contract)	4,501,728				
18	ALCAN RIO TINTO (Special Contract)	350,686				
19		4,852,414				
20						
21						
22						
23						
24	CENTURY ALUMINUM (Special Contract)			\$ 1,020,014.18	\$ 25,520.64	\$ 404.22
25	ALCAN RIO TINTO (Special Contract)			\$ 778,766.02	\$ 11,615.85	\$ 3,872.17
26				\$ 1,798,780.20	\$ 37,136.49	\$ 4,276.39
27	CENTURY ALUMINUM (Special Contract)					
28	ALCAN RIO TINTO (Special Contract)					
29	TOTAL CENTURY/ ALCAN RIO TINTO					
30						
31	BALANCE AS SHOWN ON OPERATING REPORT					

Big Rivers Electric Corporation

Monthly Billing Summary

Smelters

October 2012

	FAC		ES		NONFAC PPA		SURCHARGE	TOTAL FAC.ES, NONFAC PPA.
	AMT	MILLS	AMT	MILLS	AMT	MILLS		SURCHARGE
1								
2								
3								
4	BASE MONTHLY ENERGY -							
5								
6								
7								
8								
9	BASE FIXED ENERGY							
10								
11								
12								
13								
14								
15								
16	BASE VARIABLE ENERGY							
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								

**Big Rivers Electric Corporation
 Monthly Billing Summary
 Sales to Electric Utilities
 May 2012**

	KWH	AMOUNT	REVENUE \$ MILLS/KWH
1			
2			
3	SPECIAL SALES TO RUS BORROWERS:		
4			
5	12,150,417	\$ 383,796.77	31.59
6	KENERGY-DOMTAR COGEN		
7	POWERSOUTH ENERGY COOP		
8	12,150,417	\$ 383,796.77	31.59
9	TOTAL SPECIAL SALES TO RUS BORROWERS		
10			
11			
12			
13	TO OTHER THAN RUS BORROWERS:		
14			
15	9,268,000	\$ 275,540.36	29.73
16	134,663,800	\$ 3,826,267.67	28.41
17			
18			
19	143,931,800	\$ 4,101,808.03	28.50
20	TOTAL TO OTHER THAN RUS BORROWERS		
21			
22	156,082,217	\$ 4,485,604.80	28.74
	TOTAL SALES FOR RESALE MAY 2012		

**Big Rivers Electric Corporation
 Monthly Billing Summary
 Sales to Electric Utilities
 June 2012**

	KWH	AMOUNT	REVENUE \$ MILLS/KWH
1			
2			
3	SPECIAL SALES TO RUS BORROWERS:		
4			
5	7,749,500	\$ 248,325.54	32.04
6	KENERGY-DOMTAR COGEN		
7	POWERSOUTH ENERGY COOP		
8	7,749,500	\$ 248,325.54	32.04
9	TOTAL SPECIAL SALES TO RUS BORROWERS		
10			
11			
12			
13	TO OTHER THAN RUS BORROWERS:		
14	0	\$ 12,338.50	0.00
15	ADM INVESTOR SERVICES		
16	0	\$ -	0.00
17	95,460,500	\$ 2,621,226.85	27.46
18	HAMPL		
19		\$ (11.73)	
20	MISO		
21			
22			
23	95,460,500	\$ 2,633,553.62	27.59
	TOTAL TO OTHER THAN RUS BORROWERS		
	103,210,000	\$ 2,881,879.16	27.92
	TOTAL SALES FOR RESALE JUNE 2012		

**Big Rivers Electric Corporation
 Monthly Billing Summary
 Sales to Electric Utilities
 July 2012**

	KWH	AMOUNT	REVENUE \$ MILLS/KWH
1			
2			
3	SPECIAL SALES TO RUS BORROWERS:		
4			
5	5,676,311	\$ 263,431.87	46.41
6	KENERGY-DOMTAR COGEN		
7	POWERSOUTH ENERGY COOP		
8	5,676,311	\$ 263,431.87	46.41
9	TOTAL SPECIAL SALES TO RUS BORROWERS		
10			
11			
12			
13	TO OTHER THAN RUS BORROWERS:		
14		\$ (36,802.50)	0.00
15	ADM INVESTOR SERVICES		
16	101,780,400	\$ 3,520,224.21	34.59
17		\$ (7.31)	
18	PJM		
19	101,780,400	\$ 3,483,414.40	34.22
20	TOTAL TO OTHER THAN RUS BORROWERS		
21			
22	107,456,711	\$ 3,746,846.27	34.87
23	TOTAL SALES FOR RESALE JULY 2012		

**Big Rivers Electric Corporation
Monthly Billing Summary
Sales to Electric Utilities
August 2012**

	KWH	AMOUNT	REVENUE \$ MILLS/KWH
1			
2			
3	SPECIAL SALES TO RUS BORROWERS:		
4			
5	19,505,765	\$ 617,590.05	31.66
6	KENERGY-DOMTAR COGEN		
7	POWERSOUTH ENERGY COOP		
8	19,505,765	\$ 617,590.05	31.66
9	TOTAL SPECIAL SALES TO RUS BORROWERS		
10			
11			
12			
13	TO OTHER THAN RUS BORROWERS:		
14		\$ 4.00	0.00
15	1,010	\$ 36.65	36.29
16	180,000	\$ 6,960.60	38.67
17	67,617,400	\$ 1,884,066.56	27.86
18		\$ (3,861.98)	
19			
20	67,798,410	\$ 1,887,205.83	27.84
21	TOTAL TO OTHER THAN RUS BORROWERS		
22			
23			
24	87,304,175	2,504,795.88	28.69
	TOTAL SALES FOR RESALE AUGUST 2012		

**Big Rivers Electric Corporation
 Monthly Billing Summary
 Sales to Electric Utilities
 September 2012**

	KWH	AMOUNT	REVENUE \$ MILLS/KWH
1			
2			
3	SPECIAL SALES TO RUS BORROWERS:		
4			
5	25,055,579	\$ 840,285.87	33.54
6	KENERGY-DOMTAR COGEN		
7	POWERSOUTH ENERGY COOP		
8	25,055,579	\$ 840,285.87	33.54
9	TOTAL SPECIAL SALES TO RUS BORROWERS		
10			
11			
12			
13	TO OTHER THAN RUS BORROWERS:		
14			0.00
15	ADM INVESTOR SERVICES		
16	108,947,400	\$ 3,238,747.77	29.73
17		\$ (121.38)	
18	PJM		
19	108,947,400	\$ 3,238,626.39	29.73
20	TOTAL TO OTHER THAN RUS BORROWERS		
21			
22	134,002,979	\$ 4,078,912.26	30.44
23	TOTAL SALES FOR RESALE SEPTEMBER 2012		

**Big Rivers Electric Corporation
 Monthly Billing Summary
 Sales to Electric Utilities
 October 2012**

	KWH	AMOUNT	REVENUE \$ MILLS/KWH
1			
2			
3	SPECIAL SALES TO RUS BORROWERS:		
4			
5	17,557,859	\$ 639,093.39	36.40
6	KENERGY-DOMTAR COGEN		
7	POWERSOUTH ENERGY COOP		
8	17,557,859	\$ 639,093.39	36.40
9	TOTAL SPECIAL SALES TO RUS BORROWERS		
10			
11			
12			
13	TO OTHER THAN RUS BORROWERS:		
14			0.00
15	ADM INVESTOR SERVICES		
16			0.00
17	107,195,400	\$ 3,222,672.35	30.06
18		\$ 32.41	
19			
20	107,195,400	\$ 3,222,704.76	30.06
21	TOTAL TO OTHER THAN RUS BORROWERS		
22			
23	124,753,259	\$ 3,861,798.15	30.96
	TOTAL SALES FOR RESALE OCTOBER 2012		

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 13)**

2 *a. Provide a schedule of the calculation of the 12-month*
3 *average line loss by month for November 2010 through*
4 *October 2012.*

5 *b. Describe the actions that Big Rivers has taken to reduce*
6 *line loss during this period.*

7

8 **Response)**

9 a. Please see the table attached to this response for calculations of
10 the 12-month average line losses for November 2010 through
11 October 2012.

12 b. While line losses remain reasonable, Big Rivers did modify a
13 normal switching configuration during the period from November
14 2010 through October 2012. This change resulted in a slight line
15 loss reduction of not more than 0.1 MW. No other actions were
16 deemed necessary.

17

18

19 **Witnesses)** Nicholas R. Castlen (a.) and

20 Christopher S. Bradley (b.)

21

Big Rivers Electric Corporation
Case No. 2012-00555
12 Month Average Line Loss Calculation
November 2010 - October 2012

	(a)	(b)	(c)	(d)
Line No.	12 Months Ended	12 Month Total kWh Member Sales Plus Off System Sales	12 Month Total Line Losses	12 Month Line Losses as a Percent of Total Sales (c) / (b)
1	Nov-10	11,811,168,241	154,569,064	1.31%
2	Dec-10	11,969,420,378	156,948,984	1.31%
3	Jan-11	12,040,922,037	154,830,897	1.29%
4	Feb-11	12,025,644,710	149,897,832	1.25%
5	Mar-11	12,098,795,927	152,360,520	1.26%
6	Apr-11	12,260,854,217	138,169,352	1.13%
7	May-11	12,501,453,779	137,599,284	1.10%
8	Jun-11	12,606,589,228	136,073,004	1.08%
9	Jul-11	12,752,323,346	125,695,596	0.99%
10	Aug-11	12,832,061,812	125,725,384	0.98%
11	Sep-11	12,980,289,977	124,461,418	0.96%
12	Oct-11	13,162,797,506	125,173,413	0.95%
13	Nov-11	13,271,783,240	124,948,689	0.94%
14	Dec-11	13,255,124,574	128,056,251	0.97%
15	Jan-12	13,143,496,439	134,758,743	1.03%
16	Feb-12	13,056,328,768	144,799,075	1.11%
17	Mar-12	12,950,432,231	148,130,652	1.14%
18	Apr-12	12,827,072,852	174,095,918	1.36%
19	May-12	12,680,646,045	175,209,076	1.38%
20	Jun-12	12,580,041,883	182,234,178	1.45%
21	Jul-12	12,477,521,604	193,598,321	1.55%
22	Aug-12	12,342,892,840	201,703,343	1.63%
23	Sep-12	12,247,294,259	207,119,819	1.69%
24	Oct-12	12,153,085,681	210,699,313	1.73%

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 14)** *List Big Rivers' scheduled, actual, and forced outages between*
2 *May 1, 2012, and October 31, 2012.*

3

4 **Response)** Please see the attached schedule for the information requested on
5 scheduled ("S"), actual ("A"), and forced ("F") outages.

6

7

8 **Witness)** Lawrence V. Baronowsky

9

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
 Unit #1 - Coal - 65MW Net
 May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May	S,A	----->	5/5/2012 6:00	----->	5/5/2012 6:50	102:00		102:50	The unit was removed from reserve standby to repair the oil leak on the #1 Tie Transformer (Start Up Power) that was located earlier.
June		No Outages							
July	F			7/2/2012 3:40	7/4/2012 1:50		46:10		The unit was removed from service to repair a superheater tube leak.
	F			7/4/2012 3:37	7/4/2012 11:57		8:20		The unit tripped on low vacuum due to a broken shaft on the circulating water pump that cools the condenser.
	F			7/28/2012 13:45	7/28/2012 21:51		8:06		The unit tripped on low vacuum due to the circulating water pump that cools the condenser tripped and cooling water flow was interrupted.
	F			7/28/2012 22:41	7/29/2012 16:00		17:19		The unit was tripped off line by the operator due to a fire in "B" pulverizer.
	F			7/30/2012 5:47	7/30/2012 8:22		2:35		Starting failure was declared when the unit did not tie on line within the allotted time due to a problem with B1 burner air register.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
 Grand Island Station Unit #1 - Coal - 65MW Net
 May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
August	F			8/4/2012 13:34	8/6/2012 12:00		46:26		The unit was removed from service because of high opacity due to ash bridging in the precipitator.
September		No Outages							
October		No Outages							

**Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
May 1, 2012 thru October 31, 2012**

Schedule vs. Actual

Big Rivers Electric Corporation
Braid Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May	S,A	5/21/2012 8:00	5/21/2012 12:00	5/21/2012 8:00	5/21/2012 11:40	4:00		3:40	Removed from reserve standby status to repair a gas leak on the pressure regulating valve.
June	S,A	6/4/2012 10:00	6/4/2012 11:00	6/4/2012 10:10	6/4/2012 10:55	1:00		0:45	Removed from reserve standby status to calibrate a gas sensor.
	F			6/28/2012 11:10	6/28/2012 11:27			0:17	Starting failure was declared when the unit did not tie on line within the allotted time due to a problem with the generator excitation relay.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
 Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net
 May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
July	F			7/2/2012 12:56	7/2/2012 13:46		0:50		Starting failure was declared when the unit did not tie on line within the allotted time due to low gas pressure on the transmission line.
	S,A	7/13/2012 7:00	7/13/2012 9:00	7/13/2012 7:00	7/13/2012 8:54	2:00		1:54	Removed from reserve standby status to repair #7 combustion can flame scanner.
	F			7/17/2012 9:33	7/17/2012 11:33		2:00		Starting failure was declared when the unit did not tie on line within the allotted time due to a problem with the generator excitation relay.
	F			7/18/2012 11:45	7/18/2012 12:20		0:35		Starting failure was declared when the unit did not tie on line within the allotted time due to loss of flame.
	F			7/23/2012 13:02	7/24/2012 13:53		24:51		Starting failure was declared when the unit did not tie on line within the allotted time due to trouble with #7 combustion can flame scanner and the generator sync relay.
	S,A	7/25/2012 5:00	7/25/2012 8:00	7/25/2012 4:55	7/25/2012 7:24	3:00		2:29	Removed from reserve standby status to replace #7 combustion can flame scanner.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
 Meigs Station Unit #2 - Combustion Turbine - Oil/Gas - 65MW Net
 May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
August	F			8/27/2012 13:09	8/27/2012 13:40		0:31		Unit tripped on loss of flame due to a problem with the flame scanners.
	F			8/31/2012 15:57	8/31/2012 16:36		0:39		Unit tripped on loss of flame due to a problem with the flame scanners.
September	F			9/4/2012 10:24	9/4/2012 11:09		0:45		Unit tripped on loss of flame due to a problem with the flame scanners.
	S,A	9/5/2012 5:00	9/5/2012 7:00	9/5/2012 5:00	9/5/2012 7:00	2:00		2:00	Removed from reserve standby status to replace the amplifier for #7 and #8 combustion can flame scanners.
	F			9/7/2012 16:15	9/7/2012 16:35		0:20		The unit tripped on high oil temperature due to the cooling tower fans failed to start in automatic.
October	F			10/16/2012 6:01	10/16/2012 6:44		0:43		Starting failure was declared when the unit did not tie on line within the allotted time due to a problem with the flame scanners.
	F			10/18/2012 16:45	10/18/2012 17:37		0:52		Starting failure was declared when the unit did not tie on line within the allotted time due to a trip condition on #4 compressor bleed valve.
	F			10/31/2012 6:43	10/31/2012 8:55		2:12		Starting failure was declared when the unit did not tie on line within the allotted time due to a flame scanner failure.
	S,A	10/31/2012 12:00	10/31/2012 14:00	10/31/2012 12:00	10/31/2012 13:50	2:00		1:50	Removed from reserve standby status to repair a gas leak on the fuel heater at the pressure reducing station.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Anderson Station Two - Unit #1 - Coal - 153MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May	S,A	----->	5/2/2012 0:00	----->	5/6/2012 3:36	24:00		123:36	The unit was off line for a 768 hour planned maintenance outage. All of the outage work was completed on schedule but the unit remained off line while the Transmission Department completed repairs on the #1 Tie Transformer in the Reid switchyard that supplies start up power to the unit.
	F			5/6/2012 4:36	5/7/2012 23:53			43:17	The unit tripped on differential expansion of the turbine due to problems controlling superheat temperature.
	F			5/8/2012 8:22	5/8/2012 18:50			10:28	The unit was removed from service to repair a steam leak on the east end DA tank drain.
	S,A	5/18/2012 0:00	5/19/2012 12:00	5/18/2012 0:29	5/19/2012 13:54	36:00		37:25	The unit was removed from service to wash the air heaters.
June	S,A	6/15/2012 0:00	6/17/2012 12:00	6/15/2012 0:10	6/17/2012 12:10	60:00		60:00	The unit was removed from service to make warranty repairs to the new Low NOx burners that were installed in April.
July		No Outages							

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Anderson Station Two - Unit #1 - Coal - 153MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
August	F			8/3/2012 10:37	8/7/2012 6:25		91:48		The unit was removed from service to repair a superheater tube leak.
	S,A	8/19/2012 0:00	8/20/2012 12:00	8/18/2012 23:50	8/20/2012 14:14	36:00		38:24	The unit was removed from service to wash the air heaters.
September	No Outages								
October	F			10/25/2012 18:40	10/28/2012 18:57		72:17		The unit was removed from service to repair a steam leak on the turbine right hand stop valve before seat drain line.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Anderson Station Two - Unit #2 - Coal - 159MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May	S,A	----->	5/4/2012 18:00	----->	5/5/2012 13:08	90:00		109:08	The unit was removed from service while the Transmission Department completed repairs on the #1 Tie Transformer in the Reid switchyard that supplies start up power to the unit. The outage was delayed when the center phase of 0189 disconnect would not close automatically and had to be manually closed.
	F			5/6/2012 22:52	5/7/2012 13:16		14:24		The unit was removed from service to repair refractory around #9 soot blower.
	F			5/23/2012 18:45	5/26/2012 3:23		56:38		The unit was removed from service to repair a superheater tube leak.
June		No Outages							
July	F			7/17/2012 22:22	7/19/2012 22:57		48:35		The unit was removed from service to repair a economizer tube leak.
	F			7/20/2012 0:57	7/20/2012 5:55		4:58		The unit tripped on emergency boiler trip when an Instrument Technician investigating a blown fuse in the A1 coal pipe circuit shorted the redundant input card to ground and lost indication to the burner management system.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Anderson Station Two - Unit #2 - Coal - 159MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
August	F			8/27/2012 10:52	8/29/2012 10:09		47:17		The unit was removed from service to repair a water wall tube leak.
September	F			9/5/2012 8:50	9/5/2012 10:03		1:13		The unit tripped on high drum level when the operator was taking "B" pulverizer out of service to repair a coal leak on the west end trunion seal.
	F			9/7/2012 22:23	9/9/2012 16:30		42:07		The unit was removed from service to repair a superheater tube leak.
October	F			10/5/2012 7:02	10/7/2012 12:26		53:24		The unit was removed from service to repair a superheater tube leak.
	F			10/14/2012 18:39	10/15/2012 2:13		7:34		The unit tripped when the lightning arrestor on #1 buss failed and caused OCB's 162 and 182 to open while OCB 192 was opened for maintenance in the switchyard which disconnected the generator from the power grid.
	F			10/15/2012 2:14	10/15/2012 3:02		0:48		The unit was tripped during start up to test the emergency boiler trip circuit.
	F			10/16/2012 5:46	10/18/2012 3:23		45:37		The unit was removed from service to repair a superheater tube leak.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Green Station Unit #1 - Coal/Pet coke - 231MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May		No Outages							
June		No Outages							
July		No Outages							
August	F			8/1/2012 7:15	8/2/2012 2:21		19:06		The unit was removed from service to repair the electromatic safety valve.
	F			8/13/2012 23:45	8/15/2012 7:09		31:24		The unit was removed from service to repair a primary superheater tube leak.
September	F			9/27/2012 12:37	9/27/2012 16:03		3:26		The unit tripped on high furnace pressure when the linkage arm on "B" ID Fan slipped off and let the inlet damper go closed.
October	F			10/12/2012 14:01	10/15/2012 1:21		59:20		The unit was removed from service to repair a reheater tube leak.

Case No. 2012-00555

Attachment for Response to Staff Item 14

Witness: Lawrence V. Baronowsky

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Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Green Station Unit #2 - Coal/Pet coke - 223MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May		No Outages							
June		No Outages							
July	S,A	7/21/2012 21:00	7/22/2012 3:00	7/21/2012 20:43	7/22/2012 2:42	6:00		5:59	The unit was removed from service to repair the connections on switches 0110-3 and 0116-1 in the Reid switchyard.
August	F			8/16/2012 5:17	8/18/2012 12:38			55:21	The unit was removed from service to repair a primary superheater tube leak.
September	S,A	9/29/2012 0:00	----->	9/29/2012 0:00	----->	48:00		48:00	The unit was removed from reserve standby status to complete some capital projects that were budgeted during 2012.
October		----->	10/23/12 0:00	----->	10/22/2012 23:43	528:00		527:43	The unit was removed from reserve standby status to complete some capital projects that were budgeted during 2012.

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Coleman Station Unit #1 - Coal - 150MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May		No Outages							
June		No Outages							
July		No Outages							
August	F			8/14/2012 12:52	8/17/2012 5:40		64:48		The unit was removed from service to repair a reheater tube leak.
	F			8/28/2012 22:27	8/31/2012 18:00		67:33		The unit was removed from service to repair holes in #2 and #6 burners.
September	F			9/6/2012 18:54	9/8/2012 19:00		48:06		The unit was removed from service to repair a primary superheater tube leak.
	F			9/10/2012 16:52	9/12/2012 22:02		53:10		The unit was removed from service to repair boiler gas leaks on the east side wetbottom seal.
	F			9/29/2012 18:44	----->		29:16		The unit was removed from service to repair a water wall tube leak.

**Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
May 1, 2012 thru October 31, 2012**

Schedule vs. Actual

Big Rivers Electric Corporation
Clemens Station Unit #1 - Coal - 150MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
October	F			----->	10/3/2012 10:11			58:11	The unit was removed from service to repair a water wall tube leak.
	F				10/3/2012 13:02	10/4/2012 22:13		33:11	The unit was removed from service to repair boiler gas leaks in the middle left ROFA box.
	F				10/13/2012 14:43	10/16/2012 17:28		74:45	The unit was removed from service to repair a reheater tube leak.
	F				10/21/2012 1:12	10/21/2012 11:15		10:03	The unit was tripped by the emergency trip solenoid on the turbine emergency protection panel due to an electrical malfunction.

Big Rivers Electric Corporation
Scheduled ("S"), Actual ("A"), and Forced ("F") Outages
May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
 Poleman Station Unit #2 - Coal - 138MW Net
 May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May		No Outages							
June		No Outages							
July	S,A	7/12/2012 0:00	7/16/2012 0:00	7/12/2012 1:00	7/15/2012 23:59	96:00		94:59	The unit was removed from service to wash the air heaters and clean the condenser.
August	F			8/25/2012 10:29	8/28/2012 1:07		62:38		The unit was removed from service to repair a reheater tube leak.
September	F			9/22/2012 9:48	9/24/2012 0:05		38:17		The unit was removed from service to repair tube leaks in the west side wall of the Heat Recovery Area.
October		No Outages							

Big Rivers Electric Corporation Scheduled ("S"), Actual ("A"), and Forced ("F") Outages May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
Coleman Station Unit #3 - Coal - 155MW Net
May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May		No Outages							
June	F			6/21/2012 7:44	6/21/2012 10:24		2:40		The unit tripped on low furnace seal air pressure when "B" seal air fan tripped and "A" seal air fan did not auto-start.
	F			6/29/2012 22:49	6/30/2012 1:04		2:15		Unit was removed from service to replace the left hand intercept valve servo.
July		No Outages							
August	S,A	8/18/2012 0:00	8/23/2012 6:00	8/18/2012 0:51	8/23/2012 5:46	126:00		124:55	The unit was removed from service to wash the air heaters and clean the condenser.
September		No Outages							
October		No Outages							

Big Rivers Electric Corporation

Scheduled ("S"), Actual ("A"), and Forced ("F") Outages

May 1, 2012 thru October 31, 2012

Schedule vs. Actual

Big Rivers Electric Corporation
 Wilson Station - Unit #1 - Coal/Pet Coke - 417MW Net
 May 1, 2012 thru October 31, 2012

MONTH	TYPE	MAINTENANCE				HOURS OF DURATION			REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled		Actual		Scheduled	Forced	Actual	
		FROM	TO	FROM	TO				
May		No Outages							
June	F			6/11/2012 13:54	6/12/2012 1:16			11:22	The unit tripped on low drum level when the normal electrical feed to MCC 12A22 that was powering the #1 boiler feed pump main oil pump tripped which caused the boiler feed pump turbine to trip.
July	F			7/28/2012 12:34	7/31/2012 16:44			76:10	The unit was removed from service to repair a platen superheater tube leak.
August		No Outages							
September	F			9/1/2012 13:06	9/1/2012 18:04			4:58	Unit tripped due to low drum level following a boiler upset that was caused by #2 ID fan damper locking up.
October	F			10/16/2012 17:06	10/18/2012 16:30			47:24	The unit was removed from service to repair a water wall tube leak.
	F			10/28/2012 1:56	10/29/2012 7:41			29:45	The unit was removed from service to repair a water wall tube leak.

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

Response to Commission Staff's Request for Information
dated February 13, 2013

February 28, 2013

1 Item 15) *For each existing fuel contract categorized as long-term (i.e.,*
2 *one year or more in length), provide:*

3

4

a. Supplier's name and address;

5

b. Duration of contract;

6

c. Annual tonnage requirements;

7

d. Name and location of production facility;

8

e. Date when contract was executed;

9

*f. Date(s) of each contract revision, modification, or
amendment;*

10

11

*g. Actual annual tonnage received since the contract's
inception;*

12

13

*h. Percent of annual requirements received during the
contract's term;*

14

15

i. Base price in dollars per ton;

16

*j. Total amount of price escalations to date in dollars per ton;
and*

17

18

*k. Current price paid for coal under the contract in dollars
per ton (i + j).*

19

20

21 **Response)** Please see the attached schedules for the list of existing fuel
22 contracts for the period from May 1, 2012, through October 31, 2012.

23

24

25 **Witness)** Mark W. McAdams

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

A. NAME / ADDRESS: Patriot Coal Sales, LLC.
12312 Olive Boulevard, Suite 400
St. Louis, Mo 63141

B. PRODUCTION FACILITY: Freedom Mine
Henderson County, Kentucky

C. CONTRACT EXECUTED DATE: January 1, 2009
July 17, 2009 (*Assumed by Big Rivers Electric*)

D. CONTRACT DURATION: December 31, 2012

E. CONTRACT AMENDMENTS: November 1, 2008
November 1, 2010
June 2, 2011

F. ANNUAL TONNAGE REQUIREMENTS: 2009 – 283,671 tons (*620,000 / 365 x 167*)
2010 – 1,000,000 tons
2011 – 1,000,000 tons
2012 – 108,000 tons

G. ACTUAL TONNAGE: 2009 – 289,815 tons
2010 – 982,553 tons
2011 – 989,624 tons
2012 – 108,621 tons

H. PERCENT OF ANNUAL REQUIREMENTS: 2009 – 102.17 %
2010 – 98.26 %
2011 – 98.96 %
2012 – 100.58 %

I. BASE PRICE: 2009 - \$ 38.5000 per ton
2010 - \$ 39.5010 per ton
2011 - \$ 40.4998 per ton
2012 - \$ 43.2190 per ton

J. ESCALATIONS TO DATE: 2nd Quarter 2010 - \$ 0.5456 per ton
3rd Quarter 2010 - \$ 0.9582 per ton
4th Quarter 2010 - \$ 0.8670 per ton
1st Quarter 2011 - \$ 1.1342 per ton
2nd Quarter 2011 - \$ 1.8822 per ton
3rd Quarter 2011 - \$ 2.4500 per ton
4th Quarter 2011 - \$ 2.7192 per ton

K. CURRENT CONTRACT PRICE: N/A - COMPLETE

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

A. NAME / ADDRESS: Foresight Coal Sales, LLC
3801 PGA Boulevard
Palm Beach Gardens, FL 33410

B. PRODUCTION FACILITY: Shay #1 Mine
Macoupin County, Illinois

C. CONTRACT EXECUTED DATE: March 20, 2009
July 17, 2009 (*Assumed by Big Rivers Electric*)

D. CONTRACT DURATION: June 30, 2012

E. CONTRACT AMENDMENTS: April 27, 2010
(*Modification to Quantity, Reduction in Base Price,
and Term Extension*)
January 1, 2012

F. ANNUAL TONNAGE REQUIREMENTS: 2009 – 94,880 tons
2010 – 230,000 tons
2011 – 175,120 tons

G. ACTUAL TONNAGE: 2009 – 69,036 tons
2010 – 249,443 tons
2011 – 144,184 tons
2012 – 33,558 carryover tons

H. PERCENT OF ANNUAL REQUIREMENTS: 2009 – 72.76 %
2010 – 108.45 %
2011 – 82.33 %
2012 – 100.00 % - carryover tons

I. BASE PRICE: 2009 - \$ 61.0009 per ton
2010 - \$ 50.4200 per ton
2011 - \$ 50.4200 per ton
2012 - \$ 50.4200 per ton

J. ESCALATIONS TO DATE: None

K. CURRENT CONTRACT PRICE N/A - COMPLETE

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

A. NAME / ADDRESS: Alliance Coal, LLC
1717 South Boulder Avenue
Tulsa, OK 74119

B. PRODUCTION FACILITY: Warrior Coal, Cardinal Mine
Hopkins County, Kentucky

C. CONTRACT EXECUTED DATE: July 7, 2010

D. CONTRACT DURATION: December 31, 2013

E. CONTRACT AMENDMENTS: March 6, 2012 (Revised trucking/diesel fuel)
January 1, 2013 (Revised Trucking & Qualities)

F. ANNUAL TONNAGE REQUIREMENTS: 2011 – 600,000 tons
2012 – 750,000 tons
2013 – 750,000 tons

G. ACTUAL TONNAGE: 2011 – 644,307 tons
2012 – 749,772 tons
2013 – 63,383 tons (January)

H. PERCENT OF ANNUAL REQUIREMENTS: 2011 – 107.38 %
2012 – 99.97 %
2013 – 8.45 %

I. BASE PRICE: Quality A 2011 - \$ 50.6904 per ton
Quality B 2011 - \$ 51.6504 per ton
Quality C 2011 - \$ 49.2461 per ton
Quality D 2011 - \$ 47.4996 per ton

Quality A 2012 - \$ 52.9704 per ton
Quality B 2012 - \$ 53.9736 per ton
Quality C 2012 - \$ 51.4622 per ton
Quality D 2012 - \$ 49.6363 per ton

Quality A 2013 - \$ 55.3536 per ton
Quality B 2013 - \$ 56.4024 per ton
Quality C 2013 - \$ 53.7773 per ton
Quality D 2013 - \$ 51.8696 per ton
Quality E 2013 - \$ 50.1603 per ton
Quality F 2013 - \$ 49.1150 per ton
Quality G 2013 - \$ 47.0254 per ton

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

Alliance Coal, LLC Fuel Contract Information (continued)

J. ESCALATIONS TO DATE:	None
K. CURRENT CONTRACT PRICE:	Quality A 2013 - \$ 55.3536 per ton
	Quality B 2013 - \$ 56.4024 per ton
	Quality C 2013 - \$ 53.7773 per ton
	Quality D 2013 - \$ 51.8696 per ton
	Quality E 2013 - \$ 50.1603 per ton
	Quality F 2013 - \$ 49.1150 per ton
	Quality G 2013 - \$ 47.0254 per ton

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

A. NAME / ADDRESS: Sebree Mining, LLC (formerly Allied Resources)
15 New Steamport Road
Sebree, KY 42455

B. PRODUCTION FACILITY: Onton No. 9 Mine
Webster County, Kentucky

C. CONTRACT ASSIGNMENT DATE: March 29, 2012

D. CONTRACT DURATION: December 31, 2015

E. CONTRACT AMENDMENTS: April 29, 2011
November 17, 2011
March 29, 2012 – Assigned to Sebree Mining, LLC

F. ANNUAL TONNAGE REQUIREMENTS: 2010 – 650,000 tons
2011 – 500,000 tons
2012 – 750,000 tons
2013 – 960,000 tons
2014 – 800,000 tons
2015 – 890,000 tons
2016 – 900,000 tons

G. ACTUAL TONNAGE: 2010 – 664,320 tons
2011 – 500,614 tons
2012 – 748,127 tons
2013 – 78,432 tons (January)

H. PERCENT OF ANNUAL REQUIREMENTS: 2010 – 102.20 %
2011 – 100.12 %
2012 – 99.75 %
2013 – 8.17 % (January)

I. BASE PRICE: Quality A *Sebree Complex 2011* - \$ 50.5308 per ton
Quality B *Sebree Complex 2011* - \$ 48.6790 per ton
Quality C *Sebree Complex 2011* - \$ 47.1086 per ton
Quality D *Sebree Complex 2011* - \$ 44.2420 per ton

Quality A *Steamport Dock 2011* - \$ 49.9335 per ton
Quality B *Steamport Dock 2011* - \$ 48.0800 per ton
Quality C *Steamport Dock 2011* - \$ 46.5083 per ton
Quality D *Steamport Dock 2011* - \$ 43.6414 per ton

Quality A *Sebree Complex 2012* - \$ 52.5500 per ton
Quality B *Sebree Complex 2012* - \$ 50.6259 per ton
Quality C *Sebree Complex 2012* - \$ 48.9946 per ton
Quality D *Sebree Complex 2012* - \$ 46.0108 per ton

Case No. 2012-00555

Witness: Mark W. McAdams

Attachment for Response to Staff Item 15

Page 5 of 10

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

Sebree Mining, LLC. [Execution Date – March 29, 2012] Fuel Contract Information (continued)

BASE PRICE (continued from prior page)

Quality A Steamport Dock 2012 - \$ 51.9551 per ton
Quality B Steamport Dock 2012 - \$ 50.0269 per ton
Quality C Steamport Dock 2012 - \$ 48.3943 per ton
Quality D Steamport Dock 2012 - \$ 45.4102 per ton

Quality A Sebree Complex 2013 - \$ 54.9153 per ton
Quality B Sebree Complex 2013 - \$ 53.8668 per ton
Quality C Sebree Complex 2013 - \$ 52.1824 per ton
Quality D Sebree Complex 2013 - \$ 49.1854 per ton

Quality A Steamport Dock 2013 - \$ 54.3204 per ton
Quality B Steamport Dock 2013 - \$ 53.1133 per ton
Quality C Steamport Dock 2013 - \$ 51.4303 per ton
Quality D Steamport Dock 2013 - \$ 48.4308 per ton

Quality A Sebree Complex 2014 - \$ 57.6621 per ton
Quality B Sebree Complex 2014 - \$ 55.6405 per ton
Quality C Sebree Complex 2014 - \$ 53.8706 per ton
Quality D Sebree Complex 2014 - \$ 50.5978 per ton

Quality A Steamport Dock 2014 - \$ 57.0672 per ton
Quality B Steamport Dock 2014 - \$ 55.0415 per ton
Quality C Steamport Dock 2014 - \$ 53.2703 per ton
Quality D Steamport Dock 2014 - \$ 49.9994 per ton

Quality A Sebree Complex 2015 - \$ 61.6911 per ton
Quality B Sebree Complex 2015 - \$ 59.5694 per ton
Quality C Sebree Complex 2015 - \$ 57.7116 per ton
Quality D Sebree Complex 2015 - \$ 54.2146 per ton

Quality A Steamport Dock 2015 - \$ 61.0512 per ton
Quality B Steamport Dock 2015 - \$ 58.9399 per ton
Quality C Steamport Dock 2015 - \$ 57.0745 per ton
Quality D Steamport Dock 2015 - \$ 53.5832 per ton

Quality A Sebree Complex 2016 – N/A
Quality B Sebree Complex 2016 - \$ 62.4897 per ton
Quality C Sebree Complex 2016 - \$ 60.7085 per ton
Quality D Sebree Complex 2016 - \$ 57.8600 per ton

Quality A Steamport Dock 2016 – N/A
Quality B Steamport Dock 2016 - \$ 61.1910 per ton
Quality C Steamport Dock 2016 - \$ 59.4090 per ton
Quality D Steamport Dock 2016 - \$ 56.5598 per ton

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

Sebree Mining, LLC [Execution Date - March 29, 2012] Fuel Contract Information (continued)

J. ESCALATIONS TO DATE: None

K. CURRENT CONTRACT PRICE:

Quality A Sebree Complex 2013 - \$ 54.9153 per ton
Quality B Sebree Complex 2013 - \$ 53.8668 per ton
Quality C Sebree Complex 2013 - \$ 52.1824 per ton
Quality D Sebree Complex 2013 - \$ 49.1854 per ton
Quality A Steamport Dock 2013 - \$ 54.3204 per ton
Quality B Steamport Dock 2013 - \$ 53.1133 per ton
Quality C Steamport Dock 2013 - \$ 51.4303 per ton
Quality D Steamport Dock 2013 - \$ 48.4308 per ton

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

A. NAME / ADDRESS: Armstrong Coal Company, Inc.
7733 Forsyth Boulevard, Suite 1625
St. Louis, MO 63105

B. PRODUCTION FACILITY: Parkway Mine
Muhlenberg County, Kentucky

C. CONTRACT EXECUTED DATE: July 30, 2010

D. CONTRACT DURATION: December 31, 2012

E. CONTRACT AMENDMENTS: January 1, 2011
May 26, 2011

F. ANNUAL TONNAGE REQUIREMENTS: 2011 – 250,000 tons
2012 – 500,000 tons

G. ACTUAL TONNAGE: 2011 – 249,989 tons
2012 – 500,118 tons

H. PERCENT OF ANNUAL REQUIREMENTS: 2011 – 99.99 %
2012 – 100.02 %

I. BASE PRICE: 2011 - \$ 43.7494 per ton
Quality A 2012 - \$ 45.9894 per ton
Quality B 2012 - \$ 47.2512 per ton

J. ESCALATIONS TO DATE: ***
1st Quarter 2011 - \$ 0.0381 per ton
2nd Quarter 2011 - \$ 1.4874 per ton
3rd Quarter 2011 - \$ 2.8314 per ton
2nd Quarter 2011 - \$ 2.9680 per ton
1st Quarter 2012 - \$ 5.4701 per ton
2nd Quarter 2012 - \$ 6.7954 per ton
3rd Quarter 2012 - \$ 6.6919 per ton
4th Quarter 2012 - \$ 5.5373 per ton

K. CURRENT CONTRACT PRICE: N/A - Complete

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

A. NAME / ADDRESS: Patriot CoalSales, LLC
12312 Olive Boulevard, Suite 400
St. Louis, MO 63141

B. PRODUCTION FACILITY: Freedom Mine, Henderson County, KY;
Grand Eagle Mine, Henderson County, KY;
Highland Mine, Union County, KY

C. CONTRACT EXECUTED DATE: October 24, 2011

D. CONTRACT DURATION: January 1, 2012 through
December 31, 2015

E. CONTRACT AMENDMENTS: November 8, 2011

F. ANNUAL TONNAGE REQUIREMENTS: 2012 – 964,000 tons
2013 – 700,000 tons
2014 – 700,000 tons
2015 – 700,000 tons

G. ACTUAL TONNAGE: 2012 – 963,662 tons
2013 – 32,181 tons (January)

H. PERCENT OF ANNUAL REQUIREMENTS: 2012 – 99.96 %
2013 – 4.60 %

I. BASE PRICE: Highland 2012 - \$ 48.0992 per ton
Patriot Blend 2012 - \$ 47.0624 per ton
Highland 2013 - \$ 50.0251 per ton
Highland 2014 - \$ 52.0219 per ton
Highland 2015 - \$ 54.1013 per ton

J. ESCALATIONS TO DATE: None

K. CURRENT CONTRACT PRICE: Highland 2013 - \$ 50.0251 per ton

**Big Rivers Electric Corporation
Long-Term Fuel Contract Information**

A. NAME / ADDRESS: Armstrong Coal Company, Inc.
7733 Forsyth Boulevard, Suite 1625
St. Louis, MO 63105

B. PRODUCTION FACILITY: Parkway, Big Run, Ceralvo, East Fork, Kronos,
Lewis Creek, and Equality Boot Mines
Muhlenberg and Ohio Counties, KY

C. CONTRACT EXECUTED DATE: July 4, 2011

D. CONTRACT DURATION: January 1, 2012 through
December 31, 2015

E. CONTRACT AMENDMENTS: None

F. ANNUAL TONNAGE REQUIREMENTS: 2012 – 350,000 tons
2013 – 400,000 tons
2014 – 800,000 tons
2015 – 875,000 tons

G. ACTUAL TONNAGE: 2012 – 351,376 tons
2013 – 36,358 tons (January)

H. PERCENT OF ANNUAL REQUIREMENTS: 2012 – 100.39 %
2013 – 9.09 % (January)

I. BASE PRICE: 2012 - \$ 47.2512 per ton
2013 - \$ 48.4012 per ton
2014 - \$ 51.3682 per ton
2015 - \$ 54.5123 per ton

J. ESCALATIONS TO DATE: 1st Quarter 2012 \$0.8970 per ton
2nd Quarter 2012 \$0.9039 per ton
3rd Quarter 2012 \$0.8119 per ton
4th Quarter 2012 \$(0.1679) per ton
1st Quarter 2013 \$1.3340 per ton

K. CURRENT CONTRACT PRICE: Q1 2013 - \$ 49.7352 per ton

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 16)** *Provide a schedule of the present and proposed rates that Big*
2 *Rivers seeks to change pursuant to 807 KAR 5:056, shown in comparative*
3 *form.*

4

5 **Response)** Not applicable. Please see Big Rivers' response to Item 1 above.

6

7

8 **Witness)** Travis A. Siewert

9

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 17)** *Provide a statement showing by cross-outs and italicized*
2 *inserts all proposed changes in rates. A copy of the current tariff may be*
3 *used.*

4
5 **Response)** Not applicable. Please see Big Rivers' responses to Item 1 and Item
6 16 above.

7
8
9 **Witness)** Travis A. Siewert
10

BIG RIVERS ELECTRIC CORPORATION

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February 28, 2013

1 **Item 18)**

2 *a. State whether Big Rivers regularly compares the price of its*
3 *coal purchases with those paid by other electric utilities.*

4 *b. If the response is yes, state:*

5 *(1) The utilities that are included in this comparison and*
6 *their locations; and*

7 *(2) How Big Rivers' prices compare with those of the other*
8 *utilities for the review period. Include all prices used in*
9 *the comparison in cents per MMbtu.*

10

11 **Response)**

12 a. Yes, Big Rivers has compared the price of its coal purchases
13 with those paid by other electric utilities.

14 b.

15 (1) Big Rivers' coal pricing is competitive with that of its
16 comparison group for the review period. Attached hereto
17 are tables and charts, on both a cents per MMBTU and a
18 dollar per ton basis, providing the relevant supporting
19 information.

20 (2) Utilities that are included in this comparison are Kentucky-
21 based companies. These utilities are identified on the
22 attached tables and charts.

23

24

25 **Witness)** Mark W. McAdams

Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities

Company	Cents per MMBTU												
	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	Nov-11	Dec-11	Jan-12	Feb-12	Mar-12	Apr-12	
Louisville Gas and Electric Company	196.45	189.00	199.20	195.00	198.86	197.94							
Big Rivers Electric Corporation	208.51	214.81	209.03	213.70	208.08	208.68							
Duke Energy - Kentucky	221.17	227.57	225.40	219.80	221.51	217.83							
Kentucky Utilites Company	245.45	242.26	236.22	231.94	229.30	236.81							
East Kentucky Power Cooperative	238.80	238.50	242.40	248.70	253.30	250.90							
Kentucky Power	290.97	257.11	275.27	296.41	292.45	296.30							
Company	Nov-11	Dec-11	Jan-12	Feb-12	Mar-12	Apr-12	Nov-11	Dec-11	Jan-12	Feb-12	Mar-12	Apr-12	
Louisville Gas and Electric Company	208.07	215.04	234.95	227.22	231.13	231.97							
Big Rivers Electric Corporation	220.44	220.48	223.75	232.21	229.47	229.68							
Duke Energy - Kentucky	233.60	238.32	226.33	227.86	239.10	222.95							
Kentucky Utilites Company	248.08	246.51	241.91	243.17	236.28	233.78							
East Kentucky Power Cooperative	264.40	267.20	258.80	264.20	267.30	262.70							
Kentucky Power	313.27	292.93	298.22	315.06	308.98	334.26							

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

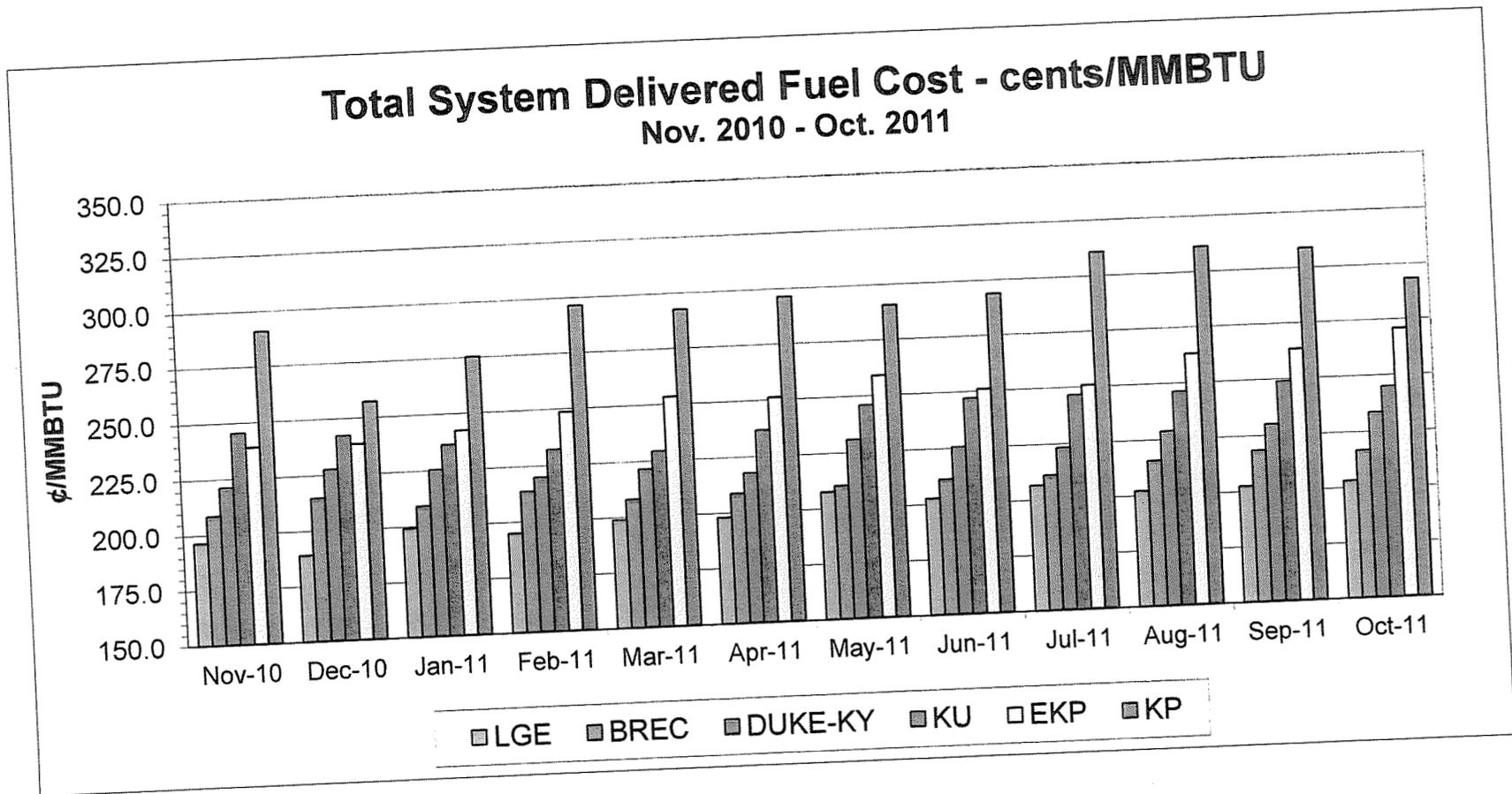
Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities

Cents per MMBTU						
Company	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11
Louisville Gas and Electric Company	207.63	202.74	206.63	202.15	202.47	203.06
Big Rivers Electric Corporation	210.25	211.17	210.94	215.73	218.37	216.65
Duke Energy - Kentucky	230.62	225.53	223.20	228.75	230.08	233.44
Kentucky Utilites Company	245.89	247.02	246.46	246.05	248.83	244.75
East Kentucky Power Cooperative	258.90	250.80	250.70	263.00	263.20	270.80
Kentucky Power	290.50	293.78	310.65	311.26	308.78	293.14

Company	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12
Louisville Gas and Electric Company	227.86	228.76	232.65	231.47	233.04	231.73
Big Rivers Electric Corporation	228.75	224.93	221.42	222.23	220.76	221.46
Duke Energy - Kentucky	231.80	226.75	233.04	230.79	229.67	247.26
Kentucky Utilites Company	238.51	238.94	244.00	240.24	238.36	227.87
East Kentucky Power Cooperative	257.90	262.20	270.10	272.60	269.30	263.00
Kentucky Power	334.55	325.64	324.98	326.08	322.47	332.03

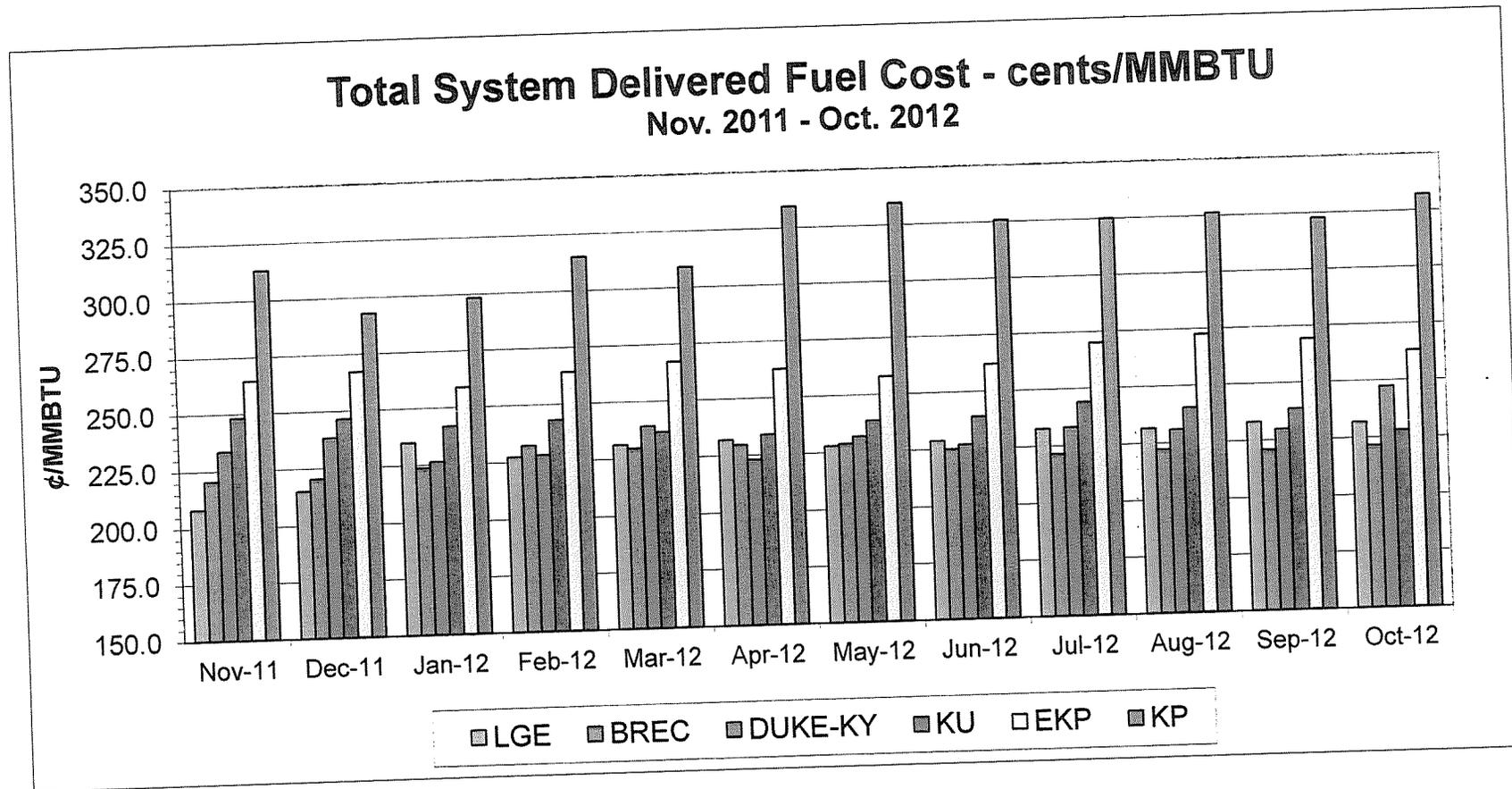
Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

**Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities**



Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

**Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities**



Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities

Company	Dollars per Ton					
	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11
Louisville Gas and Electric Company	\$44.67	\$42.69	\$44.85	\$44.23	\$45.26	\$44.87
Big Rivers Electric Corporation	\$46.73	\$48.39	\$47.26	\$48.11	\$46.83	\$47.42
Duke Energy - Kentucky	\$51.52	\$53.07	\$52.08	\$51.26	\$51.46	\$50.45
Kentucky Utilites Company	\$57.07	\$56.52	\$54.86	\$52.90	\$52.22	\$54.41
East Kentucky Power Cooperative	\$54.26	\$54.88	\$55.71	\$57.17	\$58.13	\$57.47
Kentucky Power	\$70.63	\$63.02	\$67.57	\$72.81	\$71.17	\$71.91

Company	Nov-11	Dec-11	Jan-12	Feb-12	Mar-12	Apr-12
Louisville Gas and Electric Company	\$47.18	\$48.68	\$53.21	\$51.42	\$52.34	\$52.74
Big Rivers Electric Corporation	\$49.58	\$49.75	\$50.85	\$52.99	\$53.05	\$52.72
Duke Energy - Kentucky	\$54.05	\$55.51	\$52.58	\$51.97	\$55.81	\$51.74
Kentucky Utilites Company	\$56.32	\$55.32	\$53.92	\$54.18	\$52.72	\$52.42
East Kentucky Power Cooperative	\$59.74	\$60.65	\$58.94	\$60.05	\$60.63	\$59.90
Kentucky Power	\$75.82	\$71.48	\$72.69	\$75.84	\$74.68	\$81.66

Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

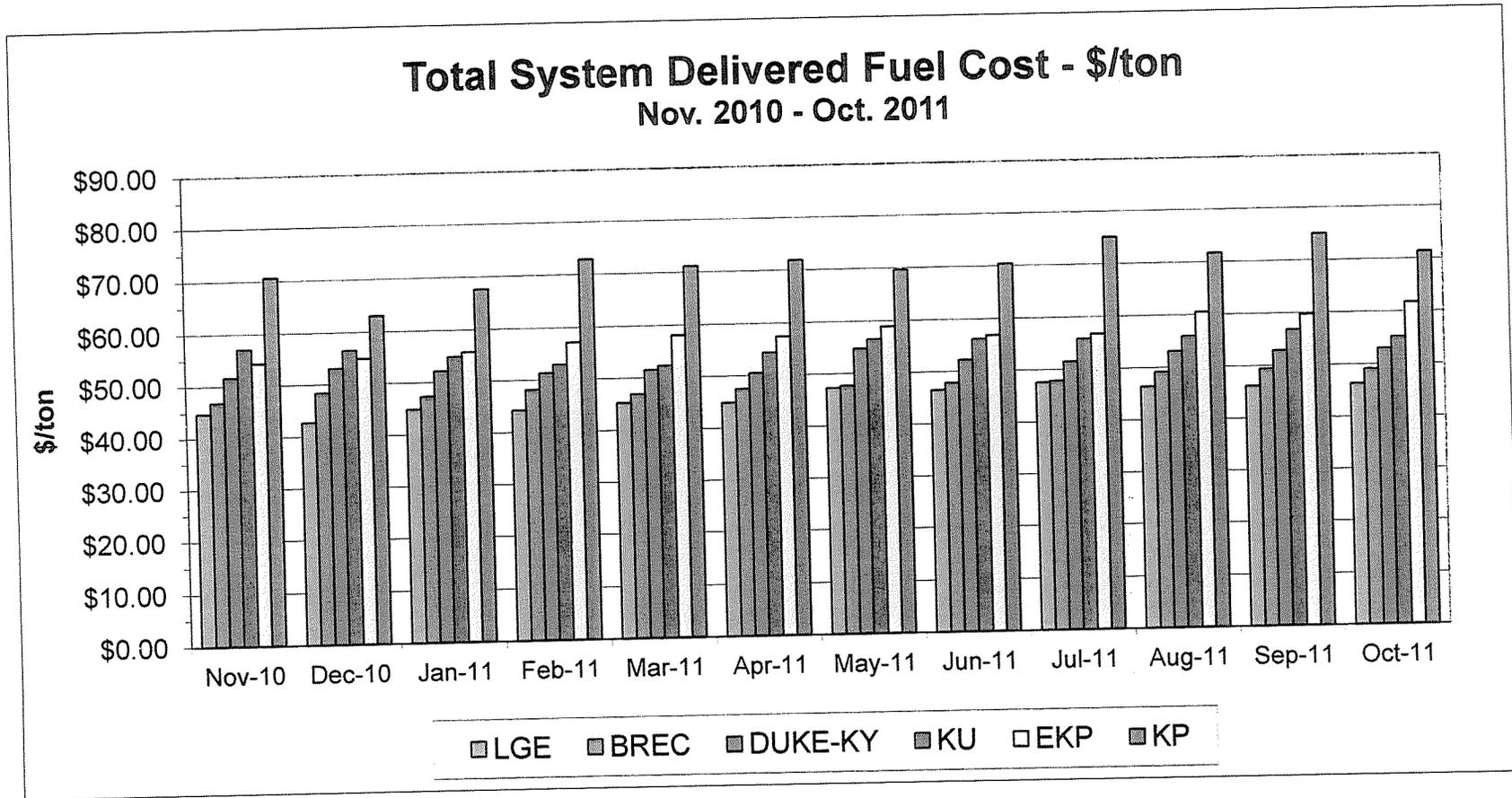
Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities

Dollars per Ton						
Company	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11
Louisville Gas and Electric Company	\$47.18	\$46.42	\$47.47	\$46.31	\$46.07	\$46.19
Big Rivers Electric Corporation	\$47.60	\$47.75	\$47.76	\$49.07	\$49.39	\$49.03
Duke Energy - Kentucky	\$54.76	\$52.14	\$51.43	\$53.08	\$52.90	\$52.99
Kentucky Utilites Company	\$56.55	\$56.20	\$55.86	\$55.95	\$56.82	\$55.17
East Kentucky Power Cooperative	\$58.94	\$56.91	\$56.81	\$60.50	\$59.81	\$61.73
Kentucky Power	\$69.61	\$70.39	\$75.08	\$71.69	\$75.00	\$71.35

Company	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12
Louisville Gas and Electric Company	\$51.62	\$51.87	\$53.69	\$52.58	\$52.88	\$52.54
Big Rivers Electric Corporation	\$52.39	\$51.67	\$51.24	\$51.23	\$50.81	\$51.01
Duke Energy - Kentucky	\$54.75	\$53.08	\$54.45	\$54.43	\$53.64	\$55.47
Kentucky Utilites Company	\$53.41	\$54.10	\$53.85	\$53.75	\$53.07	\$50.69
East Kentucky Power Cooperative	\$58.44	\$60.21	\$61.90	\$63.04	\$61.59	\$59.03
Kentucky Power	\$81.47	\$79.60	\$78.42	\$78.78	\$77.39	\$80.02

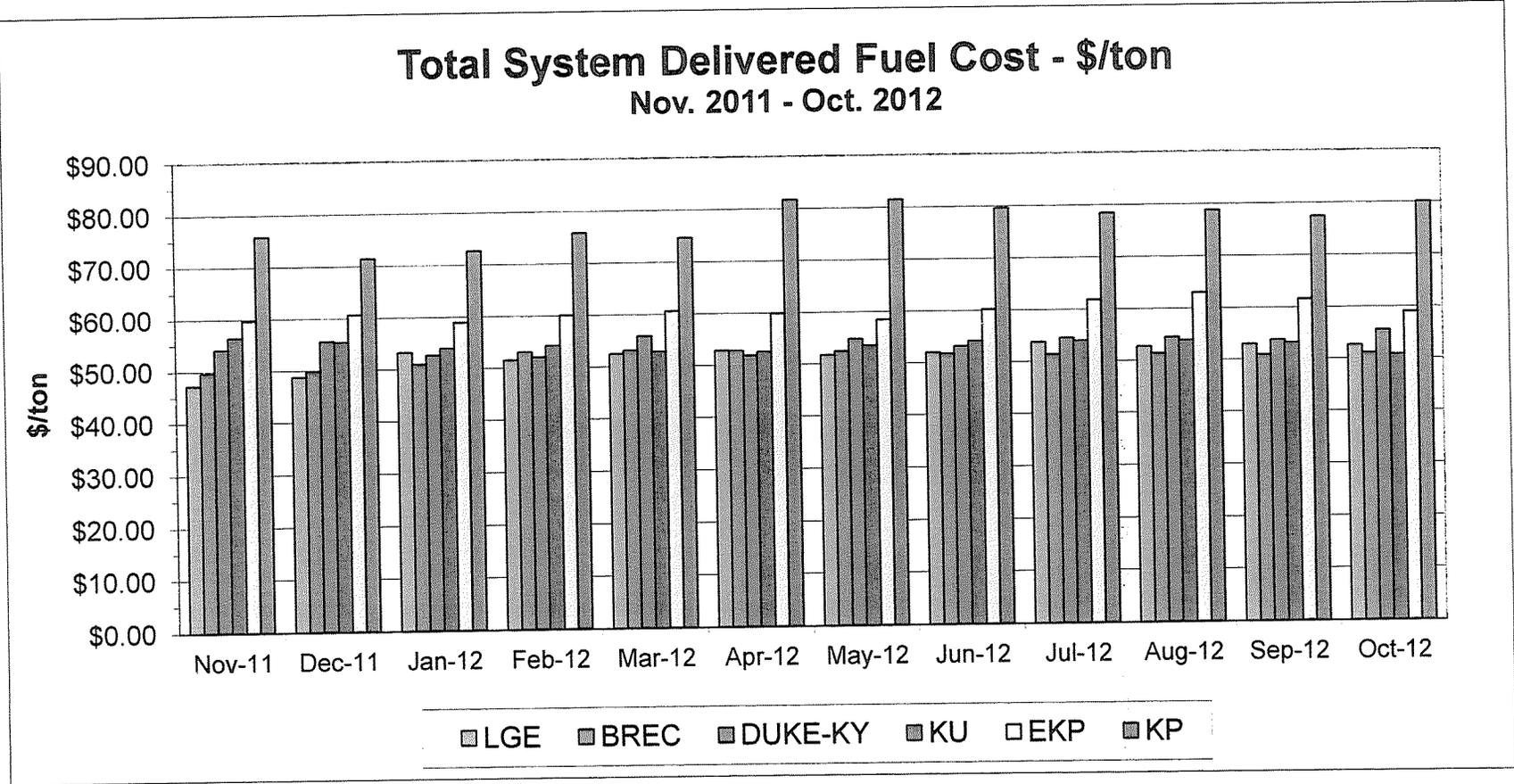
Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

**Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities**



Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

**Big Rivers Electric Corporation
Comparison of Big Rivers Fuel Cost to Other Kentucky-Based Utilities**



Source: Utilities' Monthly FAC Filings with Kentucky Public Service Commission

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

February 28, 2013

1 **Item 19)** *For the period under review by generating station, list the*
2 *percentages of Big Rivers' coal delivered by:*

3

4

a. Rail;

5

b. Truck; and

6

c. Barge.

7

8 **Response)** Big Rivers solid fuels deliveries by generating station for November
9 1, 2010 through October 31, 2012 are as follows:

10

	a. Rail	b. Truck	c. Barge
Coleman	0.00%	0.23%	99.77%
Green	0.00%	40.64%	59.36%
Reid	0.00%	100.00%	0.00%
Station II	0.00%	98.08%	1.92%
Wilson	0.00%	76.97%	23.03%
Total	0.00%	45.89%	54.11%

11

12

13

Witness) Mark W. McAdams

14

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
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February 28, 2013

1 **Item 20)** *For each generating station, state the methods of coal delivery*
2 *currently available.*

3

4 **Response)** The currently available methods for coal deliveries to Big Rivers
5 generating stations is shown below.

6

	Rail	Truck	Barge
Coleman	Not Available	Available	Available
Green	Not Available	Available	Available
Reid	Not Available	Available	Available
Station II	Not Available	Available	Available
Wilson	Not Available	Available	Available

7

8

9 **Witness)** Mark W. McAdams

10

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
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**Response to Commission Staff's Request for Information
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February 28, 2013

1 **Item 21)**

2 *a. State Big Rivers' coal inventory level in tons and in number*
3 *of days' supply as of October 31, 2012. Provide this*
4 *information by generating station and in the aggregate.*

5 *b. Describe the criteria used to determine the number of days'*
6 *supply.*

7 *c. Compare Big Rivers' coal inventory as of October 31, 2012 to*
8 *its inventory target for that date for each plant and for*
9 *total inventory.*

10 *d. If actual coal inventory exceeds inventory target by 10 days'*
11 *supply, state the reasons for the additional inventory.*

12 *e.*

13 *(1) State whether Big Rivers expects any significant*
14 *changes in its current coal inventory target within the*
15 *next 12 months.*

16 *(2) If the response is yes, state the expected change and the*
17 *reasons for this change.*

18

19 **Response)**

20

21 *a. As of October 31, 2012, Big Rivers' generating stations*
22 *individually and in the aggregate had the following inventory*
23 *levels and days' supply.*

24

25

26

BIG RIVERS ELECTRIC CORPORATION

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1

Total System/Station	Inventory Level (In Tons) ¹	Number of Days' Supply ²	Duration (In Days)	Preceding 6 Months Burn (In Tons)
Big Rivers Electric System	606,187.88	37	153	2,493,684.81
Reid Station ³	9,503.50	16	24	14,299.81
Station II ⁴	118,499.46	59	165	332,352.25
Green Station ⁵	141,670.60	36	165	711,276.05
Coleman Station ⁶	145,536.40	35	173	728,108.45
Wilson Station ⁷	190,977.92	51	177	707,648.25

2

3

b. Days Burn = [{ Current Inventory (In Tons) / Preceding 6 Months
Burn (In Tons) }] x Duration (In Days)

4

5

c. Big Rivers Electric Corporation's Target Supply is the following
range for each Station in days.

6

7

**Big Rivers Electric Corporation
Coal Inventory Target Ranges**

Total System	30 – 60 Days
Reid Station	16 – 20 Days
Station II	60 – 80 Days
Green	30 – 60 Days
Coleman	25 – 45 Days
Wilson	30 – 60 Days

8

d. The actual inventory, for each station and in the aggregate, does
not exceed the inventory target by ten (10) days.

9

10

e.

11

(1) Yes, Big Rivers anticipates a change in coal inventory held and
modification of its current coal inventory target(s) within the
next twelve months.

12

13

BIG RIVERS ELECTRIC CORPORATION

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1 (2) Inventory may be reduced at one of Big Rivers' generating
2 stations as a result of the Notice of Termination from Century
3 Aluminum.
4

Footnotes -

¹ Green Station had a petcoke inventory level of 26,049.09 tons as of October 31, and has a target blend of 20% with Green coal. Wilson Station had a petcoke inventory level of 25,125.82 tons as of October 31, and has a target blend of 30% with Wilson coal.

² Number of days' supply is rounded to reflect whole days.

³ Reid Station Unit 1 was in standby reserve 150 days. Reid 1 was out of service 10 days due to unscheduled & scheduled outages. The duration of generation was reduced to 24 days and Reid has a 16 day supply of compliance coal. Reid 1 was utilized by MISO in very late June, a large part of July and early August due to economic conditions for summer peaks.

⁴ Station II Units 1 and 2 had unscheduled and scheduled maintenance hours of 742.2 hours and Unit 1 had a planned outage of 166.9 hours in May 2012. Unit 1 had reserve hours of 12.5 hours. These hours were equivalent to 19 days. The duration of generation was reduced to 165 days.

⁵ Green Units 1 and 2 had unscheduled and scheduled maintenance hours of 750.3 hours and Green Unit 2 was in reserve standby 166.8 hours during the review period which was equivalent to 19 days. The duration of generation was reduced to 165 days.

⁶ Coleman Station Units 1, 2 and 3 were on standby reserve during the review period for 50.9 hours. Coleman Station Units 1, 2 and 3 had 535.65 unscheduled hours during the review period and 219.9 hours of scheduled maintenance hours for a total of 979.2 hours out-of-service. The duration of generation was reduced to 173 days.

⁷ Wilson Unit 1 had 169.7 unscheduled maintenance hours. The duration of generation was reduced to 177 days.

5
6
7
8

Witness) Mark W. McAdams

BIG RIVERS ELECTRIC CORPORATION

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February 28, 2013

1 **Item 22)**

2 *a. State whether Big Rivers has audited any of its coal*
3 *contracts during the period from May 1, 2012, to October 31,*
4 *2012.*

5 *b. If the response is yes, for each audited contract:*

6 *(1) Identify the contract;*

7 *(2) Identify the auditor;*

8 *(3) State the results of the audit; and*

9 *(4) Describe the actions that Big Rivers took as a result of*
10 *the audit.*

11

12 **Response)**

13 a. Big Rivers has not audited any of its coal contracts during the
14 period from May 1, 2012, to October 31, 2012.

15 b.

16 (1) Not Applicable;

17 (2) Not Applicable;

18 (3) Not Applicable; and

19 (4) Not Applicable.

20

21

22 **Witness)** Mark W. McAdams

23

BIG RIVERS ELECTRIC CORPORATION

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February 28, 2013

1 **Item 23)**

2 *a. State whether Big Rivers has received any customer*
3 *complaints regarding its FAC during the period from May*
4 *1, 2012 to October 31, 2012.*

5 *b. If the response is yes, for each complaint, state:*
6 *(1) The nature of the complaint; and*
7 *(2) Big Rivers' response.*

8

9 **Response)**

10 a. Big Rivers has received no customer complaints regarding
11 its FAC during the period from May 1, 2012, through October
12 31, 2012.

13 b. Not Applicable.

14

15

16 **Witness)** Nicholas R. Castlen

17

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
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Response to Commission Staff's Request for Information
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February 28, 2013

1 Item 24)

2 a. *State whether Big Rivers is currently involved in any*
3 *litigation with its current or former coal suppliers.*

4 b. *If the response is yes, for each litigation:*

5 (1) *Identify the coal supplier;*

6 (2) *Identify the coal contract involved;*

7 (3) *State the potential liability or recovery to Big Rivers;*

8 (4) *List the issues presented; and*

9 (5) *Provide a copy of the complaint or other legal pleading*
10 *that initiated the litigation and any answers or*
11 *counterclaims. If a copy has previously been filed with*
12 *the Commission, provide the date on which it was filed*
13 *and the case in which it was filed.*

14 c. *State the current status of all litigation with coal suppliers.*

15

16 Response)

17 a. Yes.

18 b.

19 (1) Oxford Mining Company - Kentucky, LLC ("Oxford").

20 (2) The contract involved in the litigation was executed October
21 31, 2007, and assumed by Big Rivers July 17, 2009. After Big
22 Rivers assumed the contract, Big Rivers and Oxford entered
23 into an amended and restated contract effective as of July 1,
24 2010.

25 (3) – (4)

BIG RIVERS ELECTRIC CORPORATION

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February 28, 2013

1 Oxford filed suit against Big Rivers alleging breach of contract.
2 Big Rivers counterclaimed, alleging Oxford breached the
3 contract. The issues are whether Big Rivers and/or Oxford
4 breached the contract, and if so, the damages that should be
5 awarded Oxford and/or Big Rivers. Big Rivers denies that it
6 breached the contract. For damages, Oxford is claiming lost
7 profits in an as yet undetermined amount; \$640,869.21 in the
8 form of employee severance payments and health insurance
9 benefits; losses associated with the disposal of assets and
10 equipment in an as yet undetermined amount; \$1,629,235.00
11 in the form of accelerated reclamation costs; and
12 (alternatively) an as yet undetermined amount representing
13 the differential between the market price and the contract
14 price. Big Rivers is claiming additional maintenance costs,
15 additional trucking expense, additional fuel purchases, and
16 costs, expenses and damages in obtaining Oxford's assurances,
17 in an amount in excess of the minimum dollar amount
18 necessary to establish the jurisdiction of the Ohio Circuit
19 Court, Ohio County, Kentucky.

20 (5) A copy was previously filed with the Commission on
21 September 11, 2012, Case No. 2012-00323.

22 c. The action filed by Oxford is in the discovery stage and, at this
23 time, the parties have exchanged discovery by producing
24 documents and answering written questions. Disputes have
25 developed with respect to the production of documents.

BIG RIVERS ELECTRIC CORPORATION

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1 Arguments concerning these documents production disputes will
2 be heard by the Ohio Circuit Court on March 15, 2013. The above
3 suit is the only current litigation with coal suppliers, and it is
4 pending.

5
6
7
8

Witness) Mark W. McAdams

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
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Response to Commission Staff's Request for Information
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February 28, 2013

1 Item 25) *List each written coal supply solicitation issued during the*
2 *period May 1, 2012, to October 31, 2012.*

3

4 a. *For each solicitation, provide the date of the solicitation*
5 *(contract or spot), the quantities solicited, a general*
6 *description of the quality of coal solicited, the time period*
7 *over which deliveries were requested, and the generating*
8 *unit(s) for which the coal was intended.*

9 b. *For each solicitation, state the number of vendors to whom*
10 *the solicitation was sent, the number of vendors who*
11 *responded, and the selected vendor. Provide the bid*
12 *tabulation sheet or corresponding document that ranks the*
13 *proposals. (This document shall identify all vendors who*
14 *made offers.) State the reasons for each selection. For*
15 *each lowest-cost bid not selected, explain why the bid was*
16 *not selected.*

17

18 **Response)** BRE 12-05 (Spot and Term Solicitation)

19

a.

20

i. Date solicitation was issued: September 14, 2012.

21

Date solicitation was returned: October 5, 2012.

22

ii. Type of solicitation: Spot Q4 2012 and term (2013 – 2017)
written bid solicitation (web-based distribution).

23

24

iii. Quantities solicited: Spot between 50,000 to 100,000 tons;

25

Term – up to 500,000 tons per year.

BIG RIVERS ELECTRIC CORPORATION

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February 28, 2013

- 1 iv. Quality of coal solicited:
- 2 (a) BTU/lb.: 10,500 to 13,500;
- 3 (b) Ash %: 1.0 to 15.00;
- 4 (c) Moisture %: 10.00 to 12.00;
- 5 (d) Sulfur (lbs SO₂): 5.50 to 8.50.
- 6 v. Time period over which deliveries were requested:
- 7 (a) Spot solicitation: October through December 2012.
- 8 (b) Term solicitation: Years 2013 through 2017.
- 9 vi. Generating units for which the coal was intended include:
- 10 Coleman, Green, HMP&L Station Two, Reid, and Wilson.
- 11 b.
- 12 i. Number of vendors solicited: The coal solicitation was posted
- 13 to Big Rivers' web site for supplier review, print-out, and
- 14 written bid proposal submission. Big Rivers also notified coal
- 15 and petroleum coke journals for industry notification of the
- 16 placement of the solicitation on the web site and referral to the
- 17 web address for review and download. The web site software
- 18 captures unique visitors (which are counted only once,
- 19 eliminating in the total count visitors who view the web site
- 20 multiple times). For Bid 12-05, there were 23 returning
- 21 unique visitors (visitors who viewed our last Bid 12-04) and 34
- 22 new unique visitors that had not reviewed the web site for
- 23 prior bids. In total, there were 57 unique visitors to the web
- 24 site to review Bid 12-05.

BIG RIVERS ELECTRIC CORPORATION

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- 1 ii. Responding vendors: Four (4) vendors replied to the spot bid
2 solicitation and seven (7) vendors replied to the term bid
3 solicitation (excluding no-bid responses).
4 iii. Selected vendors:
5 (a) *Spot fuel supply*: Q4 2012 Foresight Coal Sales, LLC.
6 (b) *Term fuel supply*: No term contract awards were made
7 pursuant to this bid. Awards for one-year or less, that being
8 year 2013, were made to: Alliance Coal, LLC; ExxonMobil;
9 Foresight Coal Sales, LLC; Oxbow Carbon & Minerals, Inc.;
10 Peabody COALSALES; and, TCP Pet Coke.
11 iv. The bid tabulation spreadsheet is being provided under a
12 Petition for Confidential Treatment.
13 v. The rationale for each selection is as follows:
14 (a) *Selected spot coal vendors*:
15 ExxonMobil - provided an oral opportunity for spot pet coke
16 from the Joliet Refinery for the first half of 2013 for use at
17 Green and Wilson Stations. The offer was the most
18 competitive offer when compared to other pet coke and coal
19 offers under the BRE 12-05 bid and has been blended
20 successfully at Green and Wilson Stations. The offer was
21 accepted and a spot contract executed.
22 Foresight Coal Sales – provided a multi-year offer of coal
23 supply pursuant to the bid. Big Rivers tested the Foresight
24 Coal product during fourth quarter 2012 and found the
25 product to be acceptable at the Green and Wilson

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1 generating stations. Given uncertainties in regard to
2 forward fuel quantity requirements following Century
3 Aluminum's notice of termination, Big Rivers elected to
4 procure one-year of coal supply from Foresight Coal Sales.
5 Oxbow Carbon & Minerals - presented a competitive oral
6 offer of petroleum coke for delivery during the first half of
7 2013. The pet coke from the refinery has been successfully
8 tested and utilized during 2012. This offer was accepted
9 and a spot petroleum coke contract completed.
10 TCP Pet Coke - provided a petroleum coke opportunity for
11 the first half of 2013. The pet coke has been successfully
12 blended at Wilson and Green Stations with regional coal.
13 The TCP pet coke offer was competitive, was accepted, and
14 a spot contract executed.
15 Peabody COALSALES - provided offers of fully washed coal
16 and partially washed and raw blended coal via truck or
17 barge from its Somerville Mining operation for delivery to
18 Green Station. This raw/wash blend was tested
19 successfully at the Green Station during 2012. This offer
20 was a competitive offer for Green generating station and
21 the product could be utilized via blending with other coals
22 (including their washed coal product) at limited amounts.
23 The competitive offers were accepted and spot contracts
24 executed.

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1 Alliance Coal - provided multiple offers of varying quality
2 and from varying mines which they control and operate.
3 The multiple qualities afforded the opportunity to utilize
4 the coal Wilson, Green, Henderson, or Coleman Stations, as
5 coal needs arose. This offer was more competitive than
6 other coal offers, provided flexibilities to Big Rivers to
7 manage its coal supply per generating station need for coal
8 supply and/or inventory, was accepted, and a spot
9 contractual agreement completed.

10 (b) *Selected term coal vendors:*

11 Term coal procurement beyond year 2013 has not been
12 completed due to uncertainty regarding coal generation
13 demand following the contractual terminations provided by
14 Century Aluminum and Rio Tinto Alcan / Sebree Works.

15

16

17 **Witness)** Mark W. McAdams

18

19

In the Matter of:

AN EXAMINATION OF THE APPLICATION)
OF THE FUEL ADJUSTMENT CLAUSE OF)
BIG RIVERS ELECTRIC CORPORATION) Case No.
FROM NOVEMBER 1, 2010) 2012-00555
THROUGH OCTOBER 31, 2012)

CONFIDENTIAL RESPONSE to
Item 25.b.iv of the Commission Staff's Data Request
dated February 13, 2103
FILED: February 28, 2013

INFORMATION SUBMITTED UNDER PETITION FOR
CONFIDENTIAL TREATMENT

BIG RIVERS ELECTRIC CORPORATION

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March 1, 2013

1 Item 26) *List each oral solicitation for coal supplies issued during the*
2 *period from May 1, 2012 to October 31, 2012.*

3
4 *a. For each solicitation, state why the solicitation was not*
5 *written, the date(s) of the solicitation, the quantities*
6 *solicited, a general description of the quality of coal*
7 *solicited, the time period over which deliveries were*
8 *requested, and the generating unit(s) for which the coal*
9 *was intended.*

10 *b. For each solicitation, identify all vendors solicited and the*
11 *vendor selected. Provide the bid tabulation sheet or other*
12 *document that ranks the proposals. (This document shall*
13 *identify all vendors who made offers.) State the reasons for*
14 *each selection. For each lowest-cost bid not selected,*
15 *explain why the bid was not selected.*

16
17 **Response)**

18 a. There was/were no oral solicitation(s) for coal supplies issued
19 during the period from May 1, 2012 to October 31, 2012.

20 b. Not Applicable.

21
22
23 **Witness)** Mark W. McAdams

24

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March 1, 2013

1 *Item 27) For the period from May 1, 2012, to October 31, 2012, list each*
2 *vendor from whom coal was purchased and the quantity and nature of*
3 *each purchase (e.g., spot or contract). For the period under review in*
4 *total, provide the percentage of purchases that were spot versus contract.*
5 *For contract purchases, state whether the contract has been filed with the*
6 *Commission. If the response is no, explain why it has not been filed.*

7

8 **Response)** Please see the schedule below.

9

Purchase Vendor	Fuel Type	Purchase Tonnage	Contract Type
Alliance Coal	Coal	385,924.20	Contract
Armstrong Coal	Coal	505,776.56	Contract
Armstrong Coal	Coal	121,061.45	Spot
Coal Network	Coal	27,758.90	Spot
ExxonMobil	Pet Coke	146,793.18	Spot
Foresight Coal Sales	Coal	20,096.94	Contract
Oxbow Carbon & Minerals	Pet Coke	30,727.34	Spot
Patriot Coal Sales	Coal	571,447.50	Contract
Peabody CoalSales	Coal	207,707.00	Spot
Sebree Mining, LLC	Coal	405,608.90	Contract
TCP Pet Coke	Pet Coke	92,302.21	Spot
Total Tonnage		<u>2,515,204.18</u>	
Percentage Spot Purchase Tons ⁶		24.90 %	
Percentage Contract Purchase Tons ⁷		<u>75.10 %</u>	
Percentage Total Purchase Tons		<u>100.00 %</u>	

10

11 Big Rivers has filed its contract purchases with the Commission.

⁶ The percentage of purchases that were spot versus contract is based on the review period from May 1, 2012, to October 31, 2012.

⁷ *Ibid*

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1

2 **Witness)** Mark W. McAdams

3

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1 **Item 28)** *For the period from May 1, 2012 to October 31, 2012, list each*
2 *vendor from whom natural gas was purchased for generation and the*
3 *quantity and nature of each purchase (e.g., spot or contract). For the*
4 *period under review in total, provide the percentage of purchases that*
5 *were spot versus contract. For contract purchases, state whether the*
6 *contract has been filed with the Commission. If the response is no, explain*
7 *why it has not been filed.*

8

9 **Response)** Please see the schedule on the following page. Big Rivers purchased
10 natural gas from Atmos Energy under Atmos' tariff-based Interruptible Sales
11 Service (G-2) – Industrial and Billing Rate Code 11 WD. This tariff is on file with
12 the Kentucky Public Service Commission.

13 Starting in July 2010, Big Rivers began purchasing natural gas
14 under a North American Energy Standards Board ("NAESB") base contract for
15 sale and purchase of natural gas. Actual purchases of gas are made using
16 transaction confirmations that are governed by the NAESB contract. Big Rivers
17 also entered into a contract with Texas Gas Transmission, LLC for the
18 transportation and storage and borrowing of gas to Big Rivers' delivery point, the
19 Reid Combustion Turbine. All of these contracts are on file with the Public
20 Service Commission.

21

22

23

24

25

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1

<u>Purchase Vendor</u>	<u>Fuel Type</u>	<u>MCF</u>	<u>Contract Type</u>
Atmos Energy	Natural Gas	44,458.92	Tariff based G-2 (Contract)
NJR Energy, LLC	Natural Gas	80,454.00	Spot
Southwestern Energy Services Co.	Natural Gas	24,435.00	Spot
Percentage Contract ⁸		29.77%	
Percentage Spot ⁹		70.23%	
Percentage Total		<u>100.00%</u>	

2

3 **Witness)** Lindsay N. Barron

4

5

⁸ The percentage of purchases that were contract versus spot is based on the review period from May 1, 2012, to October 31, 2012.

⁹ *Ibid.*

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1 **Item 29)** *State whether Big Rivers engages in hedging activities for its*
2 *coal or natural gas purchases used for generation. If the response is yes,*
3 *describe the hedging activities in detail.*

4

5 **Response)** Big Rivers does not engage in financial hedging activities regarding
6 its coal or natural gas purchases used for generation.

7

8

9 **Witnesses)** Mark W. McAdams (Coal) and
10 Lindsay N. Barron (Natural Gas)

11

BIG RIVERS ELECTRIC CORPORATION

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1 **Item 30)** *For each generating station or unit for which a separate coal*
2 *pile is maintained, state for the period from May 1, 2012, to October 31,*
3 *2012 the actual amount of coal burned in tons, actual amount of coal*
4 *deliveries in tons, total kWh generated, and actual capacity factor at*
5 *which the plant operated.*

6

7 **Response)** Please see the schedule below. The North American Electric
8 Reliability Corporation's Generating Availability Data System defines Capacity
9 Factor as the value equal to the net MWh produced divided by the product of the
10 hours in the period times the unit rating in Net MWs, which is the formula for
11 this response.

12

Plant	Coal & Pet Coke Burn (Tons)	Coal & Pet Coke Receipts (Tons)	Net kWh	Capacity Factor (Net MWh) / (Period Hrs x MW rating)
Reid Station (Coal)	14,299.81	14,226.91	18,352,000	6.39 %
Station Two (Coal) *	332,352.25	295,363.89	735,470,120	76.48 %
Green Station (Coal)	532,466.15	610,524.04	1,550,090,915	77.32 %
Green Station (Pet Coke) **	178,809.90	139,582.52		
Coleman Station (Coal)	728,108.45	717,735.60	1,509,669,000	77.17 %
Wilson Station (Coal)	576,928.25	607,531.01	1,623,781,949	88.18 %
Wilson Station (Pet Coke) **	130,720.00	130,240.21		

* Net of City of Henderson. City of Henderson generation take was 318,215,000 kWhs.

** Net kWh and Capacity Factor includes energy from burning Coal and Pet Coke

13

14 **Witness)** Mark W. McAdams

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1 **Item 31)**

2 *a. During the period from May 1, 2012 to October 31, 2012,*
3 *have there been any changes to Big Rivers' written policies*
4 *and procedures regarding its fuel procurement?*

5 *b. If yes,*

6 *(1) Describe the changes;*

7 *(2) State the date(s) the changes were made;*

8 *(3) Explain why the changes were made; and*

9 *(4) Provide the written policies and procedures as changed.*

10 *c. If no, provide the date when Big Rivers' current fuel*
11 *procurement policies and procedures were last changed,*
12 *when they were last provided to the Commission, and*
13 *identify the proceeding in which they were provided.*

14

15 **Response)**

16 a. Yes. During the period May 1, 2012, to October 31. 2012, Big
17 Rivers made changes to Appendix A of the Energy Related
18 Transaction Authority Policy.

19 b. (1) through (3)

20 On May 7, 2012, Big Rivers removed the Senior VP Energy
21 Services from its Energy Related Transaction Authority Policy
22 due to the retirement of the individual in that position and the
23 subsequent elimination of the position. Big Rivers replaced
24 the Senior VP Energy Services with the VP Production.

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Response to Staff Item 31

Witnesses: Mark W. McAdams (Coal) and
Lindsay N. Barron (Natural Gas)

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1 On July 12, 2012, Big Rivers' altered its Energy Related
2 Transaction Authority Policy by changing Director of Power
3 Portfolio Optimization to Managing Director Energy Services.
4 This change was due to the retirement of the individual in the
5 Director position and the creation of the Managing Director
6 Position.

7 (4) Black-line and red-line copies of Revision 5 dated May 7, 2012,
8 and Revision 6 dated July 12, 2012, are attached to this
9 response.

10 c. Not applicable.

11

12

13 **Witnesses)** Mark W. McAdams (Coal) and

14 Lindsay N. Barron (Natural Gas)

15



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Appendix A to Energy Related Transaction Authority Policy 105

APPROVED BY: CEO	APPROVAL DATE:	5-7-2012
CEO Signature <i>Mark L. Bailey</i>		
Revision 5		
STAFF AND APM TRANSACTING AUTHORITY DELEGATIONS		

1. Purpose

The purpose of this appendix is to define the authority granted by the Big Rivers CEO ("CEO") to Big Rivers' staff and APM to execute energy-related transactions.

2. Objective

The objective of this appendix is to extend authority within Policy 105 to Big Rivers' internal staff and APM.

3. Procedural Requirements

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

Delegation of authority regarding Contract Requirements

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the VP Production and the Director of Power Portfolio Optimization and the Director of Resources and Forecasting.

4. Bilateral Electric Power and Transmission Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for power and power transmission transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	MW Size	\$/MWH	Total Volume MWH	Total \$	Total Volume MWH	Total \$
VP Production	Electric Power and Transmission	> 1 Month ≤ 1 Year	≤ 1 Year	105	\$85	16,200	\$8.1 million	657,000	\$55.8 million
		≤ 1 Month		210	No Max				
Director of Power Portfolio Optimization	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Director of Resources & Forecasting	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Power Scheduling Analyst	Electric Power and Transmission	≤ 1 Week	≤ 1 Month	450	No Max.	10,800	\$6.0 million	200,000	\$25 million
APM	Electric Power and Transmission	≤ 1 Daily	≤ 1 Week	450	No Max.	10,800	\$5.4 million	100,000	\$12 million

Delegation of authority regarding Firmness of Power

The CEO delegates his authority to sell power that is more firm than the supply source to the VP Production.

Delegation of authority regarding Transmission Firmness and Volume

The CEO delegates his authority to execute transmission purchases not of equal firmness and volume to the energy component that such transmission purchase is associated with to the VP Production.

Delegation of authority regarding Restricted Delivery Locations

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the VP Production.

5. MISO Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for MISO products.

		MISO Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
VP Production	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1750	
	Ancillary Service Awards			425	
	Capacity	≤ 2 Years	≤ 2Years	425	\$20
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap
Imports/Exports	No Max				
Director of Power Portfolio Optimization and Director of Resources & Forecasting	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1700	
	Ancillary Service Awards			425	
	Capacity	≤ 1 Year	≤ 1Year	425	\$15
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	500				
Power Scheduling Analyst	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1675	
	Ancillary Service Awards			425	
	Capacity	≤ 6 Months	≤ 6 Months	425	\$12
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	450				
APM	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1650	
	Ancillary Service Awards			425	
	Capacity	≤ 6 Months	≤ 6 Months	425	\$8
	Financial Transmission Rights	≤ 6 Months	≤ 6 Months	425	\$10
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap
Imports/Exports	400				

6. PJM Transaction Authority (Non-Bilateral)

The following outlines Big Rivers' staff and APM transaction limits for PJM products.

		PJM Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
VP Production	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	210	\$20
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	No Max	PJM Price Cap
Imports/Exports	No Max				
Director of Power Portfolio Optimization and Director of Resources & Forecasting	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 3 months	105	\$12
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	500				
Power Scheduling Analyst	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	450				
APM	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	400				

7. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	\$/MMBtu	Total Physical Volume MMBtu	Total \$	Total Physical Volume MMBtu	Total \$
VP Production	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	20,000	\$300,000	400,000	\$6 million
		≤ 1 Month		No Max	No Max	No Max	No Max		
Director of Power Portfolio Optimization	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week	≤ 1 Month	No Max.	No Max.	No Max	No Max		
Director of Resources & Forecasting	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week	≤ 1 Month	No Max.	No Max.	No Max	No Max		
APM	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	20,000	\$300,000	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000	60,000	\$900,000

***Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

Delegation of authority regarding Gas Firmness

The CEO delegates his authority to sell gas that is more firm than the supply source to the VP Production.

Delegation of authority regarding Transportation Firmness and Volume

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the VP Production.

8. Fuel Oil Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for fuel oil transactions.

<u>Title</u>	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical- Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$
VP Production	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million
		≤ 1 Month		No Max	No Max		
Director of Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million
		≤ 1 Week	≤ 1 Month	No Max	No Max		
APM	Physical Fuel Oil	As directed	As directed	As directed	As directed	As directed	As directed

9. Solid Fuel Transaction Authority

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
VP Production	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director of Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

10. Solid Fuel Transportation Authority

The following outlines Big Rivers' staff transaction limits for solid fuel transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Barge, Rail or Truck Transportation	> 3 Months ≤ 3 Years	≤ 1 Year	2.5 million	\$5	5 million	\$20 million
		≤ 3 Months		No Max	No Max		
Director of Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$5	2 million	\$10 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

11. Emission Allowance Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
Director of Fuels Procurement, Director of Power Portfolio Optimization and Director of Resources & Forecasting	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million
APM	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		

12. Limestone Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million
Director of Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million

13. Lime Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for lime reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	162,500	\$120	162,500	\$19.5 million
Director of Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	81,250	\$120	81,250	\$9.75 million

14. Acknowledgements

Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Vice President of Governmental Relations and Enterprise Risk Management who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, APM employees are governed by the ACES Power Marketing Trading Sanctions Policy).

Appendix Effective

This Transaction Authority Appendix is in effect upon the CEO's approval and shall remain in effect until a replacement appendix has been approved by the CEO.

Responsibility

It shall be the responsibility of the CEO, VP Production and the Big Rivers-IRMC and the APM-IRMC to ensure compliance with this policy.

Revisions

Big Rivers Policy 105/Appendix A Revision Record			
Number	Date	Notes	Approved by
Rev. 0	11-04-09	Energy Related Trans	Mark Bailey
Rev. 1	11-22-10	MISO and other misc. updates	Mark Bailey
Rev. 2	1-4-11	Updated Solid Fuel Transaction Authority	Mark Bailey
Rev. 3	3-18-11	Added Limestone and Lime, general cleanup	Mark Bailey
Rev. 4	12-5-11	Update Bi-Lateral and Emission limits, add authority for PJM FTRs, add VP of Production	Mark Bailey
Rev. 5	05-7-12	Remove Senior VP Energy Services from document due to retirement/elimination of role; change policy number to reflect new board policy numbers	Mark Bailey



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Appendix A to Energy Related Transaction Authority Policy 105

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APPROVED BY: CEO	APPROVAL DATE:
CEO Signature _____	
Revision <u>5</u>	
STAFF AND APM TRANSACTING AUTHORITY DELEGATIONS	

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1. Purpose

The purpose of this appendix is to define the authority granted by the Big Rivers CEO (“CEO”) to Big Rivers’ staff and APM to execute energy-related transactions.

2. Objective

The objective of this appendix is to extend authority within Policy 105 to Big Rivers’ internal staff and APM.

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3. Procedural Requirements

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

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Delegation of authority regarding Contract Requirements

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the VP Production and the Director of Power Portfolio Optimization and the Director of Resources and Forecasting.

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Deleted: of

4. Bilateral Electric Power and Transmission Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for power and power transmission transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)		Deleted: 1
		Term	Lead Time	MW Size	\$/MWH	Total Volume MWH	Total \$	Total Volume MWH	Total \$	
VP Production	Electric Power and Transmission	> 1 Month ≤ 1 Year	≤ 1 Year	105	\$85	16,200	\$8.1 million	657,000	\$5 million	Deleted: Senior VP Energy Services and Deleted: of
		≤ 1 Month		210	No Max					
Director of Power Portfolio Optimization	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million	
		> 1 Week ≤ 1 Month		105	\$100					
		≤ 1 Week	≤ 1 Month	No Max.	No Max.					
Director of Resources & Forecasting	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million	
		> 1 Week ≤ 1 Month		105	\$100					
		≤ 1 Week	≤ 1 Month	No Max.	No Max.					
Power Scheduling Analyst	Electric Power and Transmission	≤ 1 Week	≤ 1 Month	450	No Max.	10,800	\$6.0 million	200,000	\$25 million	
APM	Electric Power and Transmission	≤ 1 Daily	≤ 1 Week	450	No Max.	10,800	\$5.4 million	100,000	\$12 million	

Delegation of authority regarding Firmness of Power

The CEO delegates his authority to sell power that is more firm than the supply source to the VP Production.

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Delegation of authority regarding Transmission Firmness and Volume

The CEO delegates his authority to execute transmission purchases not of equal firmness and volume to the energy component that such transmission purchase is associated with to the VP Production.

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Delegation of authority regarding Restricted Delivery Locations

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the VP Production.

Deleted: Senior VP Energy Services and the
Deleted: of

5. MISO Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for MISO products.

		MISO Per Transaction Limits (up to)				
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh	
VP, Production	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap	
	Demand Awards			1750		
	Ancillary Service Awards			425		
	Capacity	≤ 2 Years	≤ 2Years	425	\$20	Deleted: Senior VP Energy Services and
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20	Deleted: of
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	No Max	MISO Price Cap	
Imports/Exports	No Max					
Director of Power Portfolio Optimization and Director of Resources & Forecasting	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap	
	Demand Awards			1700		
	Ancillary Service Awards			425		
	Capacity	≤ 1 Year	≤ 1Year	425	\$15	
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12	
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap	
Imports/Exports	500					
Power Scheduling Analyst	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap	
	Demand Awards			1675		
	Ancillary Service Awards			425		
	Capacity	≤ 6 Months	≤ 6 Months	425	\$12	
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized	
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap	
Imports/Exports	450					
APM	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap	
	Demand Awards			1650		
	Ancillary Service Awards			425		
	Capacity	≤ 6 Months	≤ 6 Months	425	\$8	
	Financial Transmission Rights	≤ 6 Months	≤ 6 Months	425	\$10	
	Virtual Transaction Awards	As Required by MISO	1 Operating Day	400	MISO Price Cap	
Imports/Exports	400					

6. PJM Transaction Authority (Non-Bilateral)

The following outlines Big Rivers' staff and APM transaction limits for PJM products.

		PJM Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
VP, Production	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 1 Year	≤ 1 Year	210	\$20
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	No Max No Max	PJM Price Cap	
Director of Power Portfolio Optimization and Director of Resources & Forecasting	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	≤ 1 Year	≤ 3 months	105	\$12
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	400 500	PJM Price Cap	
Power Scheduling Analyst	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	400 450	PJM Price Cap	
APM	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Financial Transmission Rights				
	Virtual Transaction Awards				
Imports/Exports	As Required by PJM	1 Operating Day	400 400	PJM Price Cap	

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7. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	S/MMBtu	Total Physical Volume MMBtu	Total \$	Total Physical Volume MMBtu	Total \$
VP Production	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	20,000	\$300,000	400,000	\$
		≤ 1 Month		No Max	No Max	No Max	No Max		
Director of Power Portfolio Optimization	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week	≤ 1 Month	No Max	No Max	No Max	No Max		
Director of Resources & Forecasting	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week	≤ 1 Month	No Max	No Max	No Max	No Max		
APM	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	20,000	\$300,000	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000	60,000	\$900,000

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Deleted: of

***Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

Delegation of authority regarding Gas Firmness

The CEO delegates his authority to sell gas that is more firm than the supply source to the VP Production.

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Delegation of authority regarding Transportation Firmness and Volume

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the VP Production.

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Deleted: of

8. Fuel Oil Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for fuel oil transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)		
		Term	Lead Time	Physical-Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$	
VP Production	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million	Deleted: Senior VP Energy Services and
		≤ 1 Month		No Max	No Max			Deleted: of
Director of Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million	
		≤ 1 Week	≤ 1 Month	No Max	No Max			
APM	Physical Fuel Oil	As directed	As directed	As directed	As directed	As directed	As directed	

9. Solid Fuel Transaction Authority

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
VP Production	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director of Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

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10. Solid Fuel Transportation Authority

The following outlines Big Rivers' staff transaction limits for solid fuel transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP, Production	Barge, Rail or Truck Transportation	> 3 Months ≤ 3 Years	≤ 1 Year	2.5 million	\$5	5 million	\$20 million
		≤ 3 Months		No Max	No Max		
Director of Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$5	2 million	\$10 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

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11. Emission Allowance Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
Director of Fuels Procurement, Director of Power Portfolio Optimization and Director of Resources & Forecasting	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million
APM	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		

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12. Limestone Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)		
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$	
VP, Production	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million	Deleted: Senior VP Energy Services and Deleted: of
Director of Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million	

13. Lime Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for lime reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)		
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$	
VP, Production	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	162,500	\$120	162,500	\$19.5 million	Deleted: Senior VP Energy Services and Deleted: of
Director of Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	81,250	\$120	81,250	\$9.75 million	

14. Acknowledgements

Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Vice President of Governmental Relations and Enterprise Risk Management who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, APM employees are governed by the ACES Power Marketing Trading Sanctions Policy).

Appendix Effective

This Transaction Authority Appendix is in effect upon the CEO's approval and shall remain in effect until a replacement appendix has been approved by the CEO.

Responsibility

It shall be the responsibility of the CEO, VP Production and the Big Rivers-IRMC and the APM-IRMC to ensure compliance with this policy.

Deleted: Senior VP Energy Services,
Deleted: of

Revisions

Big Rivers Policy 105/Appendix A Revision Record			
Number	Date	Notes	Approved by
Rev. 0	11-04-09	Energy Related Trans	Mark Bailey
Rev. 1	11-22-10	MISO and other misc. updates	Mark Bailey
Rev. 2	1-4-11	Updated Solid Fuel Transaction Authority	Mark Bailey
Rev. 3	3-18-11	Added Limestone and Lime, general cleanup	Mark Bailey
Rev. 4	12-5-11	Update Bi-Lateral and Emission limits, add authority for PJM FTRs, add VP of Production	Mark Bailey
Rev. 5		Remove Senior VP Energy Services from document due to retirement/elimination of role	Mark Bailey

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Appendix A to Energy Related Transaction Authority Policy 105

APPROVED BY: CEO	APPROVAL DATE:	7/12/12
CEO Signature <i>Mark A. T. Buley</i>		
Revision 6		
STAFF AND APM TRANSACTING AUTHORITY DELEGATIONS		

1. Purpose

The purpose of this appendix is to define the authority granted by the Big Rivers CEO (“CEO”) to Big Rivers’ staff and APM to execute energy-related transactions.

2. Objective

The objective of this appendix is to extend authority within Policy 105 to Big Rivers’ internal staff and APM.

3. Procedural Requirements

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

Delegation of authority regarding Contract Requirements

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the VP Production and the Managing Director Energy Services and the Director of Resources and Forecasting.

4. Bilateral Electric Power and Transmission Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for power and power transmission transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	MW Size	\$/MWH	Total Volume MWH	Total \$	Total Volume MWH	Total \$
VP Production	Electric Power and Transmission	> 1 Month ≤ 1 Year	≤ 1 Year	105	\$85	16,200	\$8.1 million	657,000	\$55.8 million
		≤ 1 Month		210	No Max				
Managing Director Energy Services	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Director of Resources & Forecasting	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Power Scheduling Analyst	Electric Power and Transmission	≤ 1 Week	≤ 1 Month	450	No Max.	10,800	\$6.0 million	200,000	\$25 million
APM	Electric Power and Transmission	≤ 1 Daily	≤ 1 Week	450	No Max.	10,800	\$5.4 million	100,000	\$12 million

Delegation of authority regarding Firmness of Power

The CEO delegates his authority to sell power that is more firm than the supply source to the VP Production.

Delegation of authority regarding Transmission Firmness and Volume

The CEO delegates his authority to execute transmission purchases not of equal firmness and volume to the energy component that such transmission purchase is associated with to the VP Production.

Delegation of authority regarding Restricted Delivery Locations

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the VP Production.

5. MISO Transaction Authority

The following outlines Big Rivers’ staff and APM transaction limits for MISO products.

		MISO Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
VP Production	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1750	
	Ancillary Service Awards			425	
	Capacity	≤ 2 Years	≤ 2Years	425	\$20
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	No Max No Max	MISO Price Cap
Managing Director Energy Services and Director of Resources & Forecasting	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1700	
	Ancillary Service Awards			425	
	Capacity	≤ 1 Year	≤ 1Year	425	\$15
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	400 500	MISO Price Cap
Power Scheduling Analyst	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1675	
	Ancillary Service Awards			425	
	Capacity	≤ 6 Months	≤ 6 Months	425	\$12
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	400 450	MISO Price Cap
APM	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1650	
	Ancillary Service Awards			425	
	Capacity	≤ 6 Months	≤ 6 Months	425	\$8
	Financial Transmission Rights	≤ 6 Months	≤ 6 Months	425	\$10
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	400 400	MISO Price Cap

6. PJM Transaction Authority (Non-Bilateral)

The following outlines Big Rivers' staff and APM transaction limits for PJM products.

		PJM Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
VP Production	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	210	\$20
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	No Max	PJM Price Cap
Imports/Exports	No Max				
Managing Director Energy Services and Director of Resources & Forecasting	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	≤ 1 Year	≤ 3 months	105	\$12
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	500				
Power Scheduling Analyst	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	450				
APM	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted
	Demand Awards				
	Ancillary Service Awards				
	Capacity				
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards	As Required by PJM	1 Operating Day	400	PJM Price Cap
Imports/Exports	400				

7. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	\$/MMBtu	Total Physical Volume MMBtu	Total \$	Total Physical Volume MMBtu	Total \$
VP Production	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	20,000	\$300,000	400,000	\$6 million
		≤ 1 Month		No Max	No Max	No Max	No Max		
Managing Director Energy Services	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week		≤ 1 Month	No Max.	No Max.	No Max		
Director of Resources & Forecasting	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week		≤ 1 Month	No Max.	No Max.	No Max		
APM	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	20,000	\$300,000	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000	60,000	\$900,000

***Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

Delegation of authority regarding Gas Firmness

The CEO delegates his authority to sell gas that is more firm than the supply source to the VP Production.

Delegation of authority regarding Transportation Firmness and Volume

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the VP Production.

8. Fuel Oil Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for fuel oil transactions.

<u>Title</u>	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical-Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$
VP Production	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million
		≤ 1 Month		No Max	No Max		
Director of Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million
		≤ 1 Week	≤ 1 Month	No Max	No Max		
APM	Physical Fuel Oil	As directed	As directed	As directed	As directed	As directed	As directed

9. Solid Fuel Transaction Authority

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
VP Production	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director of Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

10. Solid Fuel Transportation Authority

The following outlines Big Rivers' staff transaction limits for solid fuel transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Barge, Rail or Truck Transportation	> 3 Months ≤ 3 Years	≤ 1 Year	2.5 million	\$5	5 million	\$20 million
		≤ 3 Months		No Max	No Max		
Director of Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$5	2 million	\$10 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

11. Emission Allowance Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
Director of Fuels Procurement, Managing Director Energy Services and Director of Resources & Forecasting	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million
APM	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		

12. Limestone Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million
Director of Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million

13. Lime Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for lime reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	162,500	\$120	162,500	\$19.5 million
Director of Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	81,250	\$120	81,250	\$9.75 million

14. Acknowledgements

Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Vice President of Governmental Relations and Enterprise Risk Management who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, APM employees are governed by the ACES Power Marketing Trading Sanctions Policy).

Appendix Effective

This Transaction Authority Appendix is in effect upon the CEO's approval and shall remain in effect until a replacement appendix has been approved by the CEO.

Responsibility

It shall be the responsibility of the CEO, VP Production and the Big Rivers-IRMC and the APM-IRMC to ensure compliance with this policy.

Revisions

Big Rivers Policy 105/Appendix A Revision Record			
Number	Date	Notes	Approved by
Rev. 0	11-04-09	Energy Related Trans	Mark Bailey
Rev. 1	11-22-10	MISO and other misc. updates	Mark Bailey
Rev. 2	1-4-11	Updated Solid Fuel Transaction Authority	Mark Bailey
Rev. 3	3-18-11	Added Limestone and Lime, general cleanup	Mark Bailey
Rev. 4	12-5-11	Update Bi-Lateral and Emission limits, add authority for PJM FTRs, add VP of Production	Mark Bailey
Rev. 5	5-7-11	Remove Senior VP Energy Services from document due to retirement/elimination of role	Mark Bailey
Rev. 6		Change Director of Power Portfolio Optimization to Managing Director Energy Services	Mark Bailey



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Appendix A to Energy Related Transaction Authority Policy 105

APPROVED BY: CEO APPROVAL DATE:
CEO Signature _____
Revision 6

Deleted: 5

STAFF AND APM TRANSACTING AUTHORITY DELEGATIONS

1. Purpose

The purpose of this appendix is to define the authority granted by the Big Rivers CEO (“CEO”) to Big Rivers’ staff and APM to execute energy-related transactions.

2. Objective

The objective of this appendix is to extend authority within Policy 105 to Big Rivers’ internal staff and APM.

3. Procedural Requirements

As an appendix to Policy 105, all requirements and criteria stated within Policy 105 apply to this appendix.

Delegation of authority regarding Contract Requirements

The CEO delegates his authority to use a long form confirmation as a valid agreement in lieu of a master agreement when necessary to the VP Production and the Managing Director Energy Services and the Director of Resources and Forecasting.

Deleted: Director of Power Portfolio Optimization

4. Bilateral Electric Power and Transmission Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for power and power transmission transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	MW Size	\$/MWH	Total Volume MWH	Total \$	Total Volume MWH	Total \$
VP Production	Electric Power and Transmission	> 1 Month ≤ 1 Year	≤ 1 Year	105	\$85	16,200	\$8.1 million	657,000	\$55.8 million
		≤ 1 Month		210	No Max				
Managing Director Energy Services	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Director of Resources & Forecasting	Electric Power and Transmission	> 1 Month ≤ 3 Months	≤ 1 Year	105	\$75	14,000	\$7.0 million	500,000	\$37.5 million
		> 1 Week ≤ 1 Month		105	\$100				
		≤ 1 Week	≤ 1 Month	No Max.	No Max.				
Power Scheduling Analyst	Electric Power and Transmission	≤ 1 Week	≤ 1 Month	450	No Max.	10,800	\$6.0 million	200,000	\$25 million
APM	Electric Power and Transmission	≤ 1 Daily	≤ 1 Week	450	No Max.	10,800	\$5.4 million	100,000	\$12 million

Deleted: Director of Power Portfolio Optimization

Delegation of authority regarding Firmness of Power

The CEO delegates his authority to sell power that is more firm than the supply source to the VP Production.

Delegation of authority regarding Transmission Firmness and Volume

The CEO delegates his authority to execute transmission purchases not of equal firmness and volume to the energy component that such transmission purchase is associated with to the VP Production.

Delegation of authority regarding Restricted Delivery Locations

The CEO delegates his authority to execute transactions at other Eastern interconnection locations to the VP Production.

5. MISO Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for MISO products.

		MISO Per Transaction Limits (up to)			
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh
VP Production	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1750	
	Ancillary Service Awards			425	
	Capacity	≤ 2 Years	≤ 2Years	425	\$20
	Financial Transmission Rights	≤ 1 Year	≤ 1 Year	425	\$20
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	No Max No Max	MISO Price Cap
<u>Managing Director Energy Services and Director of Resources & Forecasting</u>	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1700	
	Ancillary Service Awards			425	
	Capacity	≤ 1 Year	≤ 1Year	425	\$15 Deleted: Director of Power Portfolio Optimization
	Financial Transmission Rights	≤ 6 months	≤ 6 months	425	\$12
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	400 500	MISO Price Cap
Power Scheduling Analyst	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1675	
	Ancillary Service Awards			425	
	Capacity	≤ 6 Months	≤ 6 Months	425	\$12
	Financial Transmission Rights	Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	400 450	MISO Price Cap
APM	Generation Awards	As Required by MISO	1 Operating Day	425	MISO Price Cap
	Demand Awards			1650	
	Ancillary Service Awards			425	
	Capacity	≤ 6 Months	≤ 6 Months	425	\$8
	Financial Transmission Rights	≤ 6 Months	≤ 6 Months	425	\$10
	Virtual Transaction Awards Imports/Exports	As Required by MISO	1 Operating Day	400 400	MISO Price Cap

6. PJM Transaction Authority (Non-Bilateral)

The following outlines Big Rivers' staff and APM transaction limits for PJM products.

		PJM Per Transaction Limits (up to)							
Title	Product	Delivery Lead Time	Term	MW Size	\$/MWh				
VP Production	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted				
	Demand Awards								
	Ancillary Service Awards								
	Capacity								
	Financial Transmission Rights					≤ 1 Year	≤ 1 Year	210	\$20
Virtual Transaction Awards	Imports/Exports	As Required by PJM	1 Operating Day	No Max	PJM Price Cap				
				No Max					
Managing Director Energy Services, and Director of Resources & Forecasting	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted				
	Demand Awards								
	Ancillary Service Awards								
	Capacity								
Financial Transmission Rights	Virtual Transaction Awards	As Required by PJM	1 Operating Day	105	\$12				
				400	PJM Price Cap				
				500					
Power Scheduling Analyst	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted				
	Demand Awards								
	Ancillary Service Awards								
	Capacity								
	Financial Transmission Rights					Not Authorized	Not Authorized	Not Authorized	Not Authorized
	Virtual Transaction Awards					Imports/Exports	As Required by PJM	1 Operating Day	400
450									
APM	Generation Awards	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted	Not Presently Transacted				
	Demand Awards								
	Ancillary Service Awards								
	Capacity								
	Financial Transmission Rights					Not Authorized	Not Authorized	Not Authorized	Not Authorized
Virtual Transaction Awards	Imports/Exports	As Required by PJM	1 Operating Day	400	PJM Price Cap				
				400					

Deleted: Director of Power Portfolio Optimization

7. Natural/Synthetic Gas and Transportation Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for natural/synthetic gas (Gas) and transportation transactions.

Title	Product	Per Transaction Limits (up to)				Per Delivery Day Limits (up to)		Aggregate Limits (up to)	
		Term	Lead Time	Physical MMBtu Volume per Day	\$/MMBtu	Total Physical Volume MMBtu	Total \$	Total Physical Volume MMBtu	Total \$
VP Production	Physical	> 1 Month ≤ 1 Year	≤ 1 Year	20,000	\$15	20,000	\$300,000	400,000	\$6 million
		≤ 1 Month		No Max	No Max	No Max	No Max		
Managing Director Energy Services	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week		≤ 1 Month	No Max	No Max	No Max		
Director of Resources & Forecasting	Physical	> 1 Week ≤ 1 Month	≤ 1 Year	10,000	\$15	10,000	\$150,000	200,000	\$3 million
		≤ 1 Week		≤ 1 Month	No Max	No Max	No Max		
APM	Physical*	≤ 1 Week	≤ 1 Week	20,000	\$15	20,000	\$300,000	100,000	\$1.5 million
	Pipeline Payback			60,000	\$15	60,000	\$900,000	60,000	\$900,000

Deleted: Director of Power Portfolio Optimization

***Excludes purchases for pipeline payback. Purchases for pipeline payback are addressed separately in the row below.**

Delegation of authority regarding Gas Firmness

The CEO delegates his authority to sell gas that is more firm than the supply source to the VP Production.

Delegation of authority regarding Transportation Firmness and Volume

The CEO delegates his authority to execute transportation purchases not of equal firmness and volume to the gas component that such transportation purchase is associated with to the VP Production.

8. Fuel Oil Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for fuel oil transactions.

<u>Title</u>	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Physical-Volume Gallons	\$/Gallon	Total Volume Gallons	Total \$
VP Production	Physical Fuel Oil	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$6	4,000,000	\$24 Million
		≤ 1 Month		No Max	No Max		
Director of Fuels Procurement	Physical Fuel Oil	> 1 Week ≤ 1 Month	≤ 1 Year	500,000	\$6	1,000,000	\$6 million
		≤ 1 Week	≤ 1 Month	No Max	No Max		
APM	Physical Fuel Oil	As directed	As directed	As directed	As directed	As directed	As directed

9. Solid Fuel Transaction Authority

The following outlines Big Rivers' staff transaction limits for solid fuel.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/MMBtu	Total Volume Tons	Total \$
VP Production	Physical Solid Fuel	> 3 Months ≤ 1 Year	≤ 1 Year	500,000	\$2.50	1.0 million	\$60 million
		≤ 3 Months		100,000	\$2.85		
Director of Fuels Procurement	Physical Solid Fuel	> 3 Months ≤ 6 Months	≤ 1 Year	250,000	\$2.50	500,000	\$30 million
		≤ 3 Months		50,000	\$2.85		

10. Solid Fuel Transportation Authority

The following outlines Big Rivers' staff transaction limits for solid fuel transportation transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Barge, Rail or Truck Transportation	> 3 Months ≤ 3 Years	≤ 1 Year	2.5 million	\$5	5 million	\$20 million
		≤ 3 Months		No Max	No Max		
Director of Fuels Procurement	Barge, Rail or Truck Transportation	> 1 Month ≤ 1 Year	≤ 1 Year	750,000	\$5	2 million	\$10 million
		≤ 1 Month	≤ 1 Month	No Max	No Max		

11. Emission Allowance Transaction Authority

The following outlines Big Rivers' staff and APM transaction limits for emission allowance transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Federal SO2 Emission Allowances	≤ 1 Year	≤ 1 Year	2,500	\$300	10,000	\$3 million
	Federal NOx Emission Allowances	≤ 1 Year		1,250	\$2,000	5,000	\$10 million
Director of Fuels Procurement, Managing Director Energy Services, and Director of Resources & Forecasting	Federal SO2 Emission Allowances	≤ 1 Year	≤ 6 months	2,000	\$275	5,000	\$1 million
	Federal NOx Emission Allowances	≤ 1 Year		500	\$1,500	2,000	\$3 million Deleted: Director of Power Portfolio Optimization
APM	Federal SO2 Emission Allowances	As directed	As directed	As directed	As directed	As directed	As directed
	Federal NOx Emission Allowances	As directed		As directed	As directed		

12. Limestone Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for limestone reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Physical Limestone Reagent	≤ 1 Year	≤ 1 Year	187,500	\$18	375,000	\$6.75 million
Director of Fuels Procurement	Physical Limestone Reagent	≤ 3 Months	≤ 1 Year	93,750	\$18	187,500	\$3.375 million

13. Lime Reagent Transaction Authority

The following outlines Big Rivers' staff transaction limits for lime reagent transactions.

Title	Product	Per Transaction Limits (up to)				Aggregate Limits (up to)	
		Term	Lead Time	Volume Tons	\$/Ton	Total Volume Tons	Total \$
VP Production	Physical Lime Reagent	≤ 1 Year	≤ 1 Year	162,500	\$120	162,500	\$19.5 million
Director of Fuels Procurement	Physical Lime Reagent	≤ 3 Months	≤ 1 Year	81,250	\$120	81,250	\$9.75 million

14. Acknowledgements

Violations and Sanctions

Violations of this Authority Policy must not occur. Any person covered by this policy who becomes aware of a violation of the Authority Policy has an affirmative duty to report the violation to the department head in which the violation occurred and to the Vice President of Governmental Relations and Enterprise Risk Management who in turn shall inform the Big Rivers CEO. However, if it is believed that the Big Rivers CEO is involved then the Big Rivers Chairman of the Board shall be notified. The responsible party(ies) will be sanctioned according to Big Rivers Risk Management Sanctions Policy (for Big Rivers Employees only, APM employees are governed by the ACES Power Marketing Trading Sanctions Policy).

Appendix Effective

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Responsibility

It shall be the responsibility of the CEO, VP Production and the Big Rivers-IRMC and the APM-IRMC to ensure compliance with this policy.

Revisions

Big Rivers Policy 105/Appendix A Revision Record			
Number	Date	Notes	Approved by
Rev. 0	11-04-09	Energy Related Trans	Mark Bailey
Rev. 1	11-22-10	MISO and other misc. updates	Mark Bailey
Rev. 2	1-4-11	Updated Solid Fuel Transaction Authority	Mark Bailey
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Rev. 6		Change Director of Power Portfolio Optimization to Managing Director Energy Services	Mark Bailey

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 **Item 32)**

2 *a. State whether Big Rivers is aware of any violations of its*
3 *policies and procedures regarding fuel procurement that*
4 *occurred prior to or during the period from May 1, 2012, to*
5 *October 31, 2012.*

6 *b. If the response is yes, for each violation:*

7 *(1) Describe the violation;*

8 *(2) Describe the action(s) that Big Rivers took upon*
9 *discovering the violation; and*

10 *(3) Identify the person(s) who committed the violation.*

11

12 **Response)**

13 a. Big Rivers is unaware of any violations of its policies and
14 procedures regarding fuel procurement that occurred during the
15 period May 1, 2012, through October 31, 2012. Big Rivers is also
16 unaware of any previously unreported violations of its policies
17 and procedures regarding fuel procurement.

18 b. Not applicable.

19

20

21 **Witness)** Mark W. McAdams

22

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 *Item 33) Identify and explain the reasons for all changes in the*
2 *organizational structure and personnel of the departments or divisions*
3 *that are responsible for Big Rivers' fuel procurement activities that*
4 *occurred during the period from May 1, 2012, to October 31, 2012.*
5

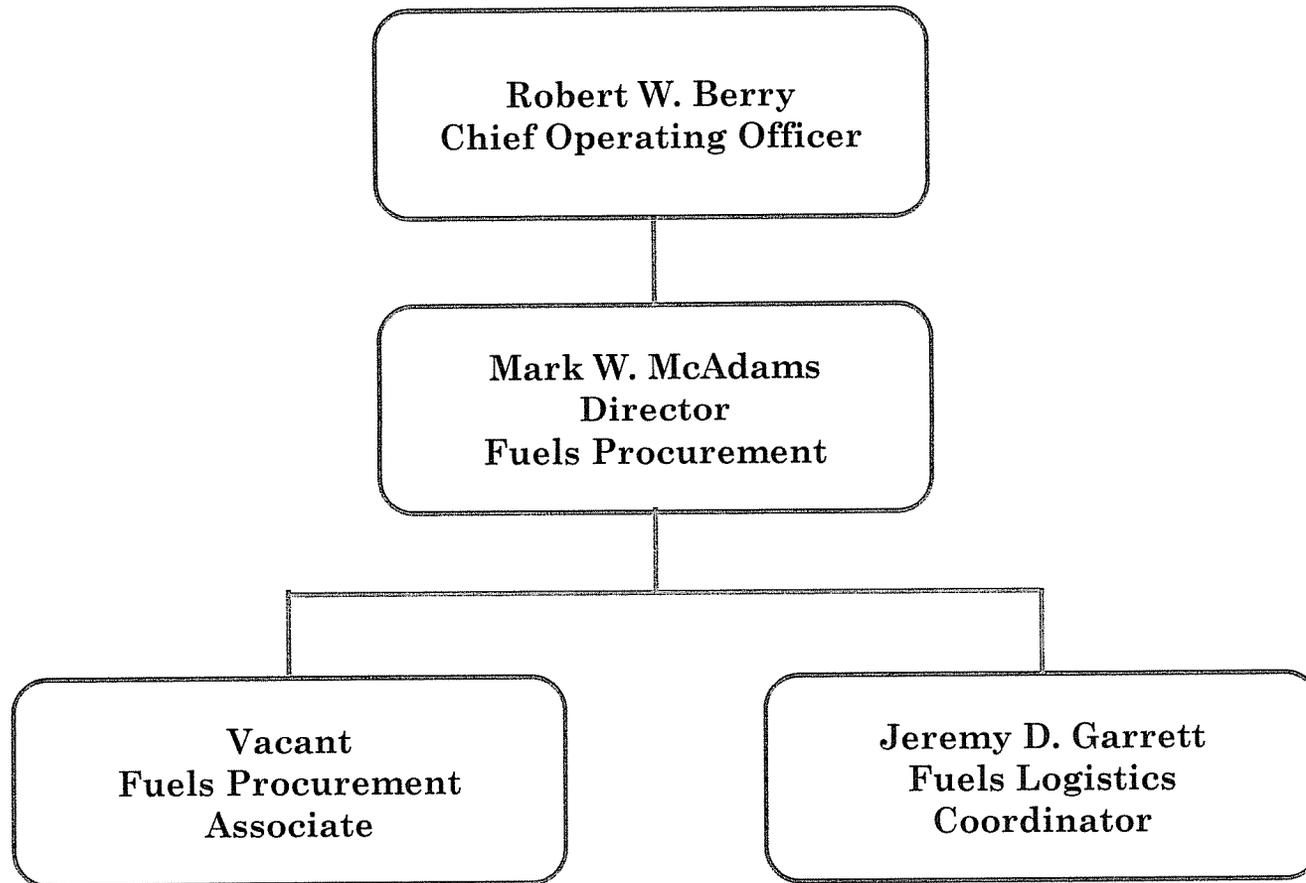
6 **Response)** As noted in Big Rivers' response to Item 17 of the Commission Staff's
7 Request for Information, dated August 22, 2012, in Big Rivers' previous Six-Month
8 FAC Review (Case No. 2012-00323) ("Item 17 Response"), Big Rivers' Fuel
9 Procurement and Energy Services Departments, which had previously reported to
10 Mr. C. William Blackburn, now report to Mr. Robert W. Berry. At the time of the
11 Item 17 Response, Mr. Berry was Big Rivers' Vice President Production.
12 Subsequent to the reporting period in question, in February 2013, Mr. Berry
13 became Big Rivers' Chief Operating Officer.

14 The Item 17 Response also noted that, in June 2012, Ms. Lindsay N.
15 Barron was appointed to the position of Managing Director, Energy Services. At
16 that time Ms. Barron reported to Mr. Berry, and she continues to report to him.
17 However, in February 2013, Ms. Barron became Big Rivers' Vice President Energy
18 Services.

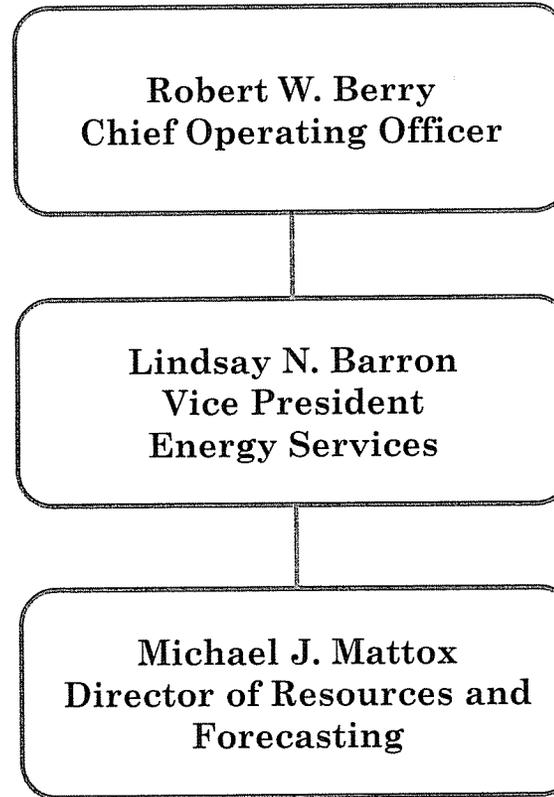
19 Charts reflecting these changes are attached.
20
21

22 **Witnesses)** Mark W. McAdams and
23 Lindsay N. Barron
24

**Big Rivers Electric Corporation
Fuels Procurement Organization
February 2013**



**Big Rivers Electric Corporation
Natural Gas Fuel Procurement Organization
February 2013**



BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 **Item 34)**

- 2 *a. Identify all changes that Big Rivers made during the period*
3 *from May 1, 2012, to October 31, 2012, to its maintenance*
4 *and operation practices that affect fuel usage at Big Rivers'*
5 *generation facilities.*
6 *b. Describe the impact of these changes on Big Rivers' fuel*
7 *usage.*

8

9 **Response)**

- 10 a. Driven by lower than expected power prices in the off system
11 sales market Big Rivers was forced to defer some maintenance
12 activities during the period under review in order to reduce
13 expenses and increase revenues to facilitate meeting its loan
14 covenants. The Coleman Unit 1 outage that was scheduled from
15 September 29 to October 27, 2012 was deferred until April,
16 2013. Additionally the Coleman Unit 3 outage that was
17 scheduled to begin October 28, 2012 was deferred until the
18 spring of 2014.
- 19 b. The reduced outage duration during this time period provided
20 Big Rivers the opportunity for an additional thirty-two days of
21 generation at Coleman. For the added generation Big Rivers
22 consumed approximately 36,270 additional tons of fuel over the
23 original budgeted amount.

24

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1

2 **Witnesses)** Lawrence V. Baronowsky (a.) and
3 Mark W. McAdams (b.)

4

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 **Item 35)**

2 *a. List all intersystem sales during the period from May 1,*
3 *2012, to October 31, 2012, in which Big Rivers used a third*
4 *party's transmission system.*

5 *b. For each sale listed above:*

6 *(1) Describe how Big Rivers addressed, for FAC reporting*
7 *purposes, the cost of fuel expended to cover any line*
8 *losses incurred to transmit its power across the third*
9 *party's transmission system; and*

10 *(2) State the line-loss factor used for each transaction and*
11 *describe how such line-loss factor was determined.*

12

13 **Response)**

14 a. Big Rivers had no intersystem sales during the period from May
15 1, 2012 to October 31, 2012 in which Big Rivers used a third
16 party's transmission system.

17 b.

18 (1) Not Applicable.

19 (2) Not Applicable.

20

21

22 **Witnesses)** Lindsay N. Barron (a. and b.(2)) and
23 Nicholas R. Castlen (b.(1))

24

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 **Item 36)** *Describe each change that Big Rivers made to its methodology*
2 *for calculating intersystem sales line losses during the period from May 1,*
3 *2012, to October 31, 2012.*

4

5 **Response)** Big Rivers has made no changes during the period May 1, 2012, to
6 October 31, 2012, to its methodology for calculating intersystem sales line losses.

7

8

9 **Witness)** Lindsay N. Barron

10

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

Response to Commission Staff's Request for Information
dated February 13, 2013

March 1, 2013

1 Item 37) *State whether Big Rivers has solicited bids for coal with the*
2 *restriction that it was not mined through strip mining or mountain top*
3 *removal. If the response is yes, explain the reasons for the restriction on*
4 *the solicitation, the quantity in tons and price per ton of the coal*
5 *purchased as a result of this solicitation, and the difference between the*
6 *price of this coal and the price it could have obtained for the coal if the*
7 *solicitation had not been restricted.*

8

9 **Response)** Big Rivers has not solicited any bids for coal with the restrictions
10 that it was not mined through strip mining or mountain top removal.

11

12

13 **Witness)** Mark W. McAdams

14

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 **Item 38)** *List Big Rivers' generating units in economic dispatch order.*
2 *State whether Big Rivers operated its generating units in economic*
3 *dispatch order during the period under review. If the response is no,*
4 *explain.*

5

6 **Response)** As a member of MISO, Big Rivers does not determine the order of
7 dispatch of its units. MISO dispatches generation to optimize system reliability
8 and economics.

9

10

11 **Witness)** Lindsay N. Barron

12

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555

Response to Commission Staff's Request for Information
dated February 13, 2013

March 1, 2013

1 Item 39) *In its most recent two-year case, Case No. 2010-00495,' the roll-*
2 *in of fuel costs into Big Rivers' base rates was approved using a "flash cut"*
3 *approach, which resulted in an immediate change from its then-existing*
4 *base fuel cost to its new base fuel cost, rather than a "transitional*
5 *approach" in which the first month's fuel cost is an average of the old and*
6 *new base fuel cost. Big Rivers also indicated its preference that any*
7 *change in base rates be approved on a "service rendered" basis rather*
8 *than a "bills rendered" basis. If the current FAC review results in changes*
9 *to its base rates, does Big Rivers continue to prefer the same "flash cut"*
10 *approach on a "service rendered" basis as authorized in Case No. 2010-*
11 *00495? Explain.*

12

13 **Response)** As explained in its response to Item 1 above, Big Rivers does not
14 believe a change to its base energy charge is warranted.

15 Big Rivers would elect the "flash cut" approach on a "service
16 rendered" basis as previously authorized. First, based on the information
17 provided in response to Item 1 above, Big Rivers believes the magnitude of any
18 change to the base fuel charge, *i.e.*, minimal, does not warrant a transitional
19 approach. Second, Big Rivers supports the "service rendered" basis because it is
20 consistent with the billing method Big Rivers currently utilizes.

21

22 **Witness)** Travis A. Siewert

23

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 **Item 40)** *[Commission Item 39] State whether any MISO costs were*
2 *included in Big Rivers' monthly FAC filings during the period from May 1,*
3 *2012, to October 31, 2012. If the response is yes, state the type and amount*
4 *of the costs.*

5
6 **Response)** Yes, there were MISO costs passed through the FAC each month
7 based solely on LMP (Location Margin Price) costs associated with Purchased
8 Power. The costs associated with Domtar Back-up related energy purchases,
9 which is shown under other purchases on page 2 of 4 of the monthly FAC Form A
10 filings, is backed out of the FAC as Domtar is invoiced for these MISO charges.
11 The MISO costs that are passed through are on page 2 of 4 of Big Rivers' monthly
12 FAC Form A filings. The detail type and amount is provided each month on the
13 Power Transaction Schedule in Big Rivers' monthly FAC Form B filing. Listed
14 below are the type and amount of the MISO costs for the period from May 1, 2012,
15 to October 31, 2012.

16

Big Rivers Electric Corporation	
MISO Costs in FAC – May 1, 2012 through October 31, 2012	
Net Energy Cost – Economy Purchases	
Unscheduled Outages < 6 Hours	\$ 171,412
Available for System	13,111,684
Identifiable Fuel Costs – Other Purchases	
Scheduled Outages	2,739,181
Cover Load & Lack of Generation	865,661
Domtar Purchases	2,739,181
Forced Outage Purchases	1,299,506
Total MISO Purchases	<u>\$ 18,410,065</u>

17

18 **Witness)** Lindsay N. Barron

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2010 THROUGH OCTOBER 31, 2012
CASE NO. 2012-00555**

**Response to Commission Staff's Request for Information
dated February 13, 2013**

March 1, 2013

1 **Item 41)** *[Commission Item 40] In Big Rivers' monthly FAC filings, on*
2 *Form A, page 2 of 4, Big Rivers credits "MISO Make Whole Payments" to its*
3 *fuel costs each month. Explain the reason that Big Rivers makes this*
4 *credit.*

5

6 **Response)** When MISO (Midwest Independent System Operator) requires
7 additional resources, it will call upon Market Participant generators to operate.
8 MISO may also call upon Market Participant generators for reliability purposes.
9 When MISO makes these requests, it will pay Market Participant generators a
10 make-whole payment to cover any revenue insufficiencies in the market. If the
11 unit does not make any margins, MISO will pay a make whole payment so the
12 unit will not lose any money. If the unit makes margins, then there is no need for
13 a make-whole payment. A portion of this make-whole payment includes start-up
14 fuel cost. Big Rivers has already included the start-up fuel cost in its monthly
15 FAC Form A filings on page 2 of 4; therefore, if Big Rivers receives a make-whole
16 payment from MISO, the start-up fuel cost portion of this make-whole payment
17 should be credited back. The start-up fuel cost portion of the MISO make-whole
18 payments is what is being credited in the monthly FAC Form A filings on page 2
19 of 4.

20

21

22 **Witness)** Lindsay N. Barron

23

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

RECEIVED

3
4
5 In the Matter of:

FEB 28 2013

6
7 AN EXAMINATION OF THE APPLICATION OF)
8 THE FUEL ADJUSTMENT CLAUSE OF BIG)
9 RIVERS ELECTRIC CORPORATION FROM)
10 NOVEMBER 1, 2010 THROUGH OCTOBER 31,)
11 2012)

PUBLIC SERVICE
COMMISSION
CASE NO.
2012-00555

12
13
14
15 **PETITION OF BIG RIVERS ELECTRIC CORPORATION FOR CONFIDENTIAL**
16 **PROTECTION**

17
18 1. Big Rivers Electric Corporation (“Big Rivers”) hereby petitions the Kentucky
19 Public Service Commission (“Commission”), pursuant to 807 KAR 5:001 Section 13 and KRS
20 61.878, to grant confidential protection to certain information contained in Big Rivers’ responses
21 to Items 5, 6, and 9, and the attachment to Item 25.b.iv of the information requested in Appendix
22 A to the Commission’s February 13, 2013, order in this matter (the “Confidential Information”).

23 2. The Confidential Information consists of Big Rivers’ projected fuel requirements
24 in tons, MCF, gallons, and dollars (Item 5); projected off-system sales kWh and dollars (Item 6);
25 planned outage schedules for 2013 and 2014 (Item 9); and a bid tabulation sheet (Item 25.b.iv
26 attachment).

27 3. One (1) copy of the responses with the Confidential Information highlighted with
28 transparent ink, printed on yellow paper, or otherwise marked “CONFIDENTIAL,” is being filed
29 with this petition. A copy of the responses, with the Confidential Information redacted, is being
30 filed with the original and each of the ten (10) copies of Big Rivers’ responses to the information
31 requests filed with this petition. 807 KAR 5:001 Sections 13(2)(a)(3), 13(2)(b).

1 other utilities is adversely affected. As is well documented in multiple proceedings before this
2 Commission, Big Rivers' margins are derived almost exclusively from its off-system sales.

3 9. Big Rivers also competes for reasonably priced credit in the credit markets, and
4 its ability to compete is directly impacted by its financial results. Any event that adversely
5 affects Big Rivers' margins will adversely affect its financial results and potentially impact the
6 price it pays for credit. As was described in the proceeding before this Commission in the Big
7 Rivers unwind transaction case, Big Rivers expects to be in the credit markets on a regular basis
8 in the future.¹

9 **II. The Confidential Information is Generally Recognized as Confidential or**
10 **Proprietary**
11

12 10. The Confidential Information for which Big Rivers seeks confidential treatment
13 under KRS 61.878(1)(c)(1) is generally recognized as confidential or proprietary under Kentucky
14 law.

15 11. The Confidential Information in the responses to Items 5 and 6 shows Big Rivers'
16 projections of fuel requirements amounts, fuel prices, and off-system sales amounts and prices;
17 the Confidential Information in the response to Item 9 is a planned outage schedule; and the
18 Confidential Information in the attachment to Item 25.b.1b is a bid tabulation sheet.

19 12. Public disclosure of projected fuel prices and off-system sales prices will give Big
20 Rivers' suppliers, buyers, and competitors insight into Big Rivers' view of future fuel prices and
21 market power prices, which would indicate the prices at which Big Rivers is willing to buy or
22 sell such items. Public disclosure of the projected fuel requirements amounts, off-system sales
23 amounts, and planned outage schedule would help Big Rivers' suppliers, buyers, and competitors

¹ See Order dated March 6, 2009, in *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*, PSC Case No. 2007-00455, pages 27-30 and 37-39.

1 to determine when Big Rivers will have power available to sell into the market or when Big
2 Rivers needs power, and the amount of power Big Rivers has to sell.

3 13. Information about a company's detailed inner workings is generally recognized as
4 confidential or proprietary. *See, e.g., Hoy v. Kentucky Indus. Revitalization Authority*, 907
5 S.W.2d 766, 768 (Ky. 1995) ("It does not take a degree in finance to recognize that such
6 information concerning the inner workings of a corporation is 'generally recognized as
7 confidential or proprietary'"). Moreover, the Commission has previously granted confidential
8 treatment to similar information. *See, e.g.,* letters from the Commission dated July 28, 2011, and
9 December 20, 2011, in *In the Matter of: Application of Big Rivers Electric Corporation for a*
10 *General Adjustment in Rates*, PSC Case No. 2011-00036 (granting confidential treatment to
11 multi-year forecast); letter from the Commission dated December 21, 2010, in *In the Matter of:*
12 *The 2010 Integrated Resource Plan of Big Rivers Electric Corporation*, PSC Case No. 2010-
13 00443 (granting confidential treatment to fuel cost projections, market price projections,
14 financial model outputs, etc.); letter from the Commission dated July 20, 2010, in Administrative
15 Case No. 387 (granting confidential treatment to a list of future scheduled outages, which can
16 give competitors insight into Big Rivers' wholesale power needs); two letters from the
17 Commission dated December 11, 2012, in *In the Matter of: Application of Big Rivers Electric*
18 *Corporation for Approval of its 2012 Environmental Compliance Plan, for Approval of its*
19 *Amended Environmental Cost Recovery Surcharge Tariff, for Certificates of Public Convenience*
20 *and Necessity, and for Authority to Establish a Regulatory Account*, PSC Case No. 2012-00063
21 (granting confidential treatment to Big Rivers' off-system sales).

22 14. The bid tabulation sheet contains confidential bids supplied by fuel suppliers and
23 Big Rivers' ranking of those bids, and it gives insight into the internal, confidential bid selection

1 methodology that Big Rivers uses. The Commission has often found that similar information
2 relating to competitive bidding is generally recognized as confidential and proprietary. *See, e.g.,*
3 Order dated August 4, 2003, in *In the Matter of: Application of the Union Light, Heat and Power*
4 *Company for Confidential Treatment*, PSC Case No. 2003-00054 (finding that bids submitted to
5 a utility were confidential). In fact, the Commission has granted confidential protection to the
6 same type of information that is presented in the bid tabulation sheets when provided by other
7 utilities in cases involving a review of their fuel adjustment clauses. *See, e.g.,* letter from the
8 Commission dated October 23, 2009, granting confidential protection to East Kentucky Power
9 Cooperative, Inc.'s bid tabulation sheet and related information in Case No. 2009-00286; letter
10 from the Commission dated December 11, 2009, granting confidential protection to Kentucky
11 Utilities Company's coal bid analysis procedure in Case No. 2009-00287. The Commission has
12 also granted confidential protection to the bid tabulation sheets that Big Rivers filed in previous
13 reviews of its fuel adjustment clause. *See, e.g.,* letter from the Commission dated May 10, 2010,
14 in Case No. 2009-00510; letter from the Commission dated September 22, 2010, in Case No.
15 2010-00269.

16 **III. Disclosure of the Confidential Information Would Permit an Unfair**
17 **Commercial Advantage to Big Rivers' Competitors**
18

19 15. Disclosure of the Confidential Information would permit an unfair commercial
20 advantage to Big Rivers' competitors. As discussed above, Big Rivers faces actual competition
21 in the wholesale power market and in the credit market. It is likely that Big Rivers would suffer
22 competitive injury if that Confidential Information was publicly disclosed.

23 16. The Confidential Information includes material such as Big Rivers' projections of
24 fuel and market power prices. If that information is publicly disclosed, potential fuel and power
25 suppliers and buyers of fuel and power would have insight into the prices Big Rivers is willing to

1 buy and sell those items at and could manipulate the bidding process, leading to higher prices or
2 lower revenues for Big Rivers and impairing its ability to compete in the wholesale power and
3 credit markets. In PSC Case No. 2003-00054, the Commission granted confidential protection to
4 bids submitted to Union Light, Heat & Power (“ULH&P”). ULH&P argued, and the
5 Commission implicitly accepted, that if the bids it received were publicly disclosed, contractors
6 on future work could use the bids as a benchmark, which would likely lead to the submission of
7 higher bids. Order dated August 4, 2003, in *In the Matter of: Application of the Union Light,
8 Heat and Power Company for Confidential Treatment*, PSC Case No. 2003-00054. The
9 Commission also implicitly accepted ULH&P’s further argument that the higher bids would
10 lessen ULH&P’s ability to compete with other gas suppliers. *Id.* Similarly, potential fuel and
11 power suppliers manipulating Big Rivers’ bidding process would lead to higher costs or lower
12 revenues to Big Rivers and would place it at an unfair competitive disadvantage in the wholesale
13 power market and credit markets.

14 17. Potential market power purchasers could use the information related to Big
15 Rivers’ projected off-system sales amounts, fuel requirements, and planned outages to know
16 when and to the extent Big Rivers is long on power and could use that information to manipulate
17 their bids, leading to lower revenues to Big Rivers and placing it at an unfair competitive
18 disadvantage in the credit markets.

19 18. Additionally, public disclosure of the fuel prices and information about Big
20 Rivers’ wholesale power needs would give the power producers and marketers with which Big
21 Rivers competes in the wholesale power market insight into Big Rivers’ cost of producing power
22 and need for power and energy during the periods covered by the information. Knowledge of
23 this information would give those power producers and marketers an unfair competitive

1 advantage because they could use that information to potentially underbid Big Rivers in
2 wholesale transactions. It would also give potential suppliers to Big Rivers a competitive
3 advantage because they will be able to manipulate the price of power bid to Big Rivers in order
4 to maximize their revenues, thereby driving up Big Rivers' costs and impairing Big Rivers'
5 ability to compete in the wholesale power and credit markets.

6 19. In PSC Case No. 2003-00054, the Commission implicitly accepted ULH&P's
7 argument that the bidding contractors would not want their bid information publicly disclosed,
8 and that disclosure would reduce the contractor pool available to ULH&P, which would drive up
9 ULH&P's costs, hurting its ability to compete with other gas suppliers. Order dated August 4,
10 2003, in *In the Matter of: Application of the Union Light, Heat and Power Company for*
11 *Confidential Treatment*, PSC Case No. 2003-00054. Similarly, in *Hoy v. Kentucky Indus.*
12 *Revitalization Authority*, the Kentucky Supreme Court found that without protection for
13 confidential information provided to a public agency, "companies would be reluctant to apply for
14 investment tax credits for fear the confidentiality of financial information would be
15 compromised. *Hoy v. Kentucky Indus. Revitalization Authority*, 907 S.W.2d 766, 769 (Ky.
16 1995).

17 20. In Big Rivers' case, if confidential treatment of the bid tabulation sheets is denied,
18 potential bidders would know that their bids would be publicly disclosed, which could reveal
19 information to their competitors about their competitiveness. Because many companies would
20 be reluctant to have such information disclosed, public disclosure of Big Rivers' bid tabulation
21 sheets would likely suppress the competitive bidding process and reduce the pool of bidders
22 willing to bid to supply Big Rivers' fuel needs, driving up Big Rivers' fuel costs (which could

1 then drive up the cost of credit to Big Rivers) and impairing its ability to compete in the
2 wholesale power market.

3 21. Also, the information contained in the bid tabulation sheets reveals the procedure
4 and strategies Big Rivers follows and the factors and inputs it considers in evaluating bids for
5 fuel supply. If the documents are publicly disclosed, potential bidders could manipulate the bid
6 solicitation process to the detriment of Big Rivers and its members by tailoring bids to
7 correspond to and comport with Big Rivers' bidding criteria and process. As in the ULH&P
8 case, potential bidders manipulating Big Rivers' bidding process would lead to higher fuel costs
9 to Big Rivers and would place it at an unfair competitive disadvantage in the wholesale power
10 market.

11 **IV. Time Period**

12 22. Big Rivers requests that the Confidential Information contained in the attachment
13 to the response to Item 25.b.iv remain confidential indefinitely because until Big Rivers changes
14 its bid selection methodology, the public disclosure of the bid tabulation sheet could be used to
15 Big Rivers' competitive disadvantage for the reasons stated above. Big Rivers requests that the
16 Confidential Information contained in the responses to Items 5, 6, and 9 remain confidential for a
17 period of two (2) years from the date of this petition, which will allow sufficient time for the
18 projected data to become historical. 807 KAR 5:001 Section 13(2)(a)(2).

19 **V. Conclusion**

20 23. Based on the foregoing, the Confidential Information is entitled to confidential
21 protection. If the Commission disagrees that Big Rivers is entitled to confidential protection, due
22 process requires the Commission to hold an evidentiary hearing. *Utility Regulatory Com'n v.*
23 *Kentucky Water Service Co., Inc.*, 642 S.W.2d 591 (Ky. App. 1982).

