ORIGINAL



BECEIVED

RECEIVED

SEP 03 2013

PUBLIC SERVICE COMMISSION

Your Touchstone Energy Cooperative

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

APPLICATION OF BIG RIVERS)
ELECTRIC CORPORATION FOR A) Case No. 2013-00199
GENERAL ADJUSTMENT IN RATES)

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

Volume 2 of 3

FILED: September 3, 2013

ORIGINAL

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

Item 66) Please state and describe the financial impact of all legal and other issues 1 which were in dispute with the City of Henderson regarding the operation of HMPL 2 3 Station Two, but were resolved since June 1, 2012. 4 5 Response) There have been no legal or other issues which were in dispute with the City of Henderson regarding the operation of HMP&L Station Two that have been resolved since 6 7 June 1, 2012. Please see Big Rivers' response to AG 1-65. 8

9

Witness)

Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 67)	As to Big Rivers' budgeting for costs associated with HMPL, has Big Rivers
2	included all	costs associated with the rulings arising out of the litigation/arbitration with
3	HMPL?	
4		
5	Response)	Please refer to Big Rivers' response to AG 1-65.
6		
7	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- Please provide Big Rivers' calculation of its share of the costs related to the Item 68) 1 dispatch and operation of HMP&L's Station Two generating station included in the Big 2 Rivers' financial forecast used in this case. Information should include spreadsheets, etc. 3 4 in electronic format compatible with Microsoft Office programs. 5 Response) Please reference the Monthly Resource Report tab of the CONFIDENTIAL 6 electronic file entitled "PSC 1-57 – Big Rivers 2013-2016 PCM – CONFIDENTIAL.xlsx" 7 8 provided in response to PSC 1-57. 9
- 10 Witness) Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

Item 69) Include on a current and updated basis all costs associated with possible

MISO requirement of HMPL operation with any Sebree smelter contract similar to the

Century agreement for Hawesville smelter.

Response) The HMP&L Station Two plant is owned by Henderson Municipal Power and
Light; therefore, no analysis has been performed under this scenario.

8

Witness)

Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 70)	If the Commission should approve the full amount of the increase the
2	Company se	eks in Case No. 2012-00535 (the Hawesville smelter case), state, in terms of
3	percentages	, the amount of the increase for both classes that will result (as contrasted with
4	BREC's cur	rent approved rates).
5	<i>a</i> .	Added to the BREC-proposed increase in Hawesville case (2012-00535),
6		identify in terms of percentages the combined effect of the increases the
7		company seeks in the instant case (the Sebree smelter case) and Hawesville
8		case on both classes.
9	b.	After reserves have been applied and exhausted, as per BREC's proposal in
10		the instant case, what will the percentage increase be (again, in terms of the
11		combined effects of both the Hawesville and Sebree smelter cases,
12		contrasted with BREC's current approved rates?
13		
14	Response)	Please see the attachment to Tab No. 6 of the Application, on the pages
15	entitled Sche	dule Showing the Amount of Rate Change Requested in Both Dollar Amounts
16	and Percento	age Change for Each Customer Classification for which the Proposed Rate
17	Change will	Apply [Gross of MRSM & RER] and Schedule Showing the Amount of Rate

Case No. 2013-00199 Response to AG 1-70 Witness: John Wolfram Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- 1 Change Requested in Both Dollar Amounts and Percentage Change for Each Customer
- 2 Classification for which the Proposed Rate Change will Apply [Net of MRSM & RER].

4 Witness) John Wolfram

3

Case No. 2013-00199 Response to AG 1-70 Witness: John Wolfram Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 71)	Confirm the following:
2	<i>a</i> .	BREC currently owns or has rights to 1,819MW of capacity;
3	<i>b</i> .	BREC's expected 2013 peak demand will be 1,529MW;
4	с.	BREC currently has a reserve margin of 19%;
5	d.	the Midcontinent Independent System Operators ("MISO") currently has a
6		14.2% reserve margin requirement;
7	e.	after the Hawesville smelter leaves the BREC system, the Company's load
8		will decline to 1,047MW, which will result in a 74% reserve margin;
9	f.	the departure of the Sebree smelter will reduce BREC's peak load to
10		679MW, which will leads to a reserve margin of 168%;
11	g.	If BREC cannot confirm these reserve margins, please state reserve margins
12		on the same basis as above, and provide supporting calculations.
13		
14	Response)	
15	a.	Confirmed. Please see Big Rivers' responses to parts b. through f., below.
16	b.	Not confirmed. Big Rivers expects its coincident peak to be 1,497 in 2013.
17	c.	Not confirmed. Big Rivers' estimated reserve margin is 22% for 2013.
18		(<u>1819</u> MW Generation) / (<u>1497</u> Peak 2013) - 1

Case No. 2013-00199 Response to AG 1-71 Witness: Lindsay N. Barron Page 1 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	d.	Not confirmed. Per MISO Business Practices Manual ("BPM")-011r12 the
2		Planning Reserve Margin Requirement ("PRMR") is not a percentage value.
3		PRMR is a MW value determined for each Load Serving Entity in MISO. Big
4		Rivers notes that per MISO BPM-011r12, page 24, MISO has a 14.2%
5		Coincident Load Based (ICAP) 14.2% Planning Reserve Margin ("PRM") and
6		a Coincident Load Based (UCAP) 6.2% PRM for the 2013-2014 Planning
7		Year.
8	e.	Not confirmed. After the Hawesville Smelter leaves the BREC System, Big
9		Rivers plans to idle the Coleman Station. At such time, Big Rivers reserve
10		margin will be roughly 36.5%. (1819 MW Generation – 443 MW Coleman) /
11		(<u>1497</u> Peak 2013 - <u>489</u> Century with Losses) - 1
12	f.	Not confirmed. After the Sebree Smelter leaves the BREC System, Big
13		Rivers plans to idle the Wilson Station. At such time, Big Rivers reserve
14		margin will be roughly 50.8%. (1819 MW Generation – 443 MW Coleman –
15		$\underline{417}$ Wilson) / ($\underline{1497}$ Peak 2013 - $\underline{489}$ Century Hawesville with Losses – $\underline{372}$
16		Century Sebree with Losses) - 1
17	g.	Please see Big Rivers' responses to parts af., above.
18		

Case No. 2013-00199 Response to AG 1-71 Witness: Lindsay N. Barron Page 2 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1 Witness) Lindsay N. Barron

Case No. 2013-00199 Response to AG 1-71 Witness: Lindsay N. Barron Page 3 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 72)	Referring to BREC's response to PSC 1-1:
2	a.	Please provide all documents prepared for and presented to the BREC
3		Board or membership explaining the February 27, 2013 changes to th
4		Amended Bylaws of Big Rivers Electric Corporation.
5	<i>b</i> .	Please explain why the February 27, 2013 changes were made to the
6		Amended Bylaws of Big Rivers Electric Corporation.
7		
8	Response)	
9	a.	Please see attached.
10	b.	The bylaws were amended to reflect changes made in positions and
11		responsibilities of certain employees of the corporation.
12		
13	Witness)	Mark A. Bailey

Case No. 2013-00199 Response to AG 1-72 Witness: Mark A. Bailey Page 1 of 1

Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-72(a)

ARTICLE IV

OFFICERS:

SECTION 1. Officers Authorized. The officers of the corporation shall be a Chair, Vice Chair, President, Secretary-Treasurer, and Vice President Production Chief Operating Officer.

The Chair, Vice Chair and Secretary-Treasurer shall be elected by and from the membership of the Board of Directors. The President shall be elected by the Board of Directors. The Vice President Production Chief Operating Officer shall be appointed by the President. The Board of Directors may appoint an Executive Secretary and one or more Assistant Secretaries, who need not be members of the Board of Directors, to perform such duties and to have such powers of the secretary as shall from time to time be assigned to the Executive Secretary or to any Assistant Secretary by the Board of Directors or by the Secretary.

<u>ARTICLE V</u>

DUTIES OF OFFICERS:

ProductionChief Operating Officer shall direct all activities related to operation and maintenance of the Corporation's generating facilities, including fuels procurement and management and power plant engineering; manage the energy services functions of the Corporation, including responsibility for generation and purchase resources, and wholesale power marketing activities; system operations, environmental services and construction and perform generally all duties incident to the office of Vice President ProductionChief Operating Officer, along with such other duties as may be prescribed by the Board of Directors from time to time.

SECTION 7. <u>Absence or Disability of President</u>. If the President is absent or becomes disabled, the <u>Vice President ProductionChief Operating Officer</u> shall have all the powers and be subject to all the duties of the President so long as such absence or disability continues.

Case No. 2013-00199 Attachment for Response to AG 1-72(a) Witness: Mark A. Bailey

Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-72(a)

SECTION 8. <u>Compensation of Officers</u>. The compensation of the officers of the corporation shall be fixed from time to time by the Board of Directors, except the compensation of the <u>Vice President ProductionChief Operating Officer</u> whose compensation shall be fixed by the President.

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES **CASE NO. 2013-00199**

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1	Item 73)	Mr. Bailey (page 6, lines 3-6) states that the rate increase is required to
2	"continue to	prudently operate and maintain its generating units, satisfy its obligations
3	under its lo	an agreements, and attract the capital necessary". Address the following and
4	provide upd	ates on a continuing basis:
5	a.	For the period 2011 through 2013 YTD, provide copies of all reports,
6		correspondence, and documentation provided by Big Rivers to rating
7		agencies regarding the Company's financial health and related issues
8		addressed at Mr. Bailey's testimony above.
9	<i>b</i> .	For the period 2011 through 2013 YTD, provide copies of all reports,
10		correspondence, and documentation provided by rate agencies to Big Rivers
11		regarding concerns with the Company's financial health and related issues
12		addressed at Mr. Bailey's testimony above.
13	с.	Regarding items (a) and (b) above, provide the most recent specific
14		requirements and recommendations of rating agencies and provide related
15		supporting documentation (reports, etc.).
16	d.	For the period 2011 through 2013 YTD, provide the amount paid by Big
17		Rivers to outside consultants to address matters in (a) to (c) above, and
18		provide the names of all consultants, the amounts paid by account number, Case No. 2013-00199 Response to AG 1-73 Witness: Billie J. Richer

Page 1 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1		a copy of all contracts, and a copy of all reports and recommendations of
2		the consultants. Identify all amounts included in the base period (show
3		actual and forecasted amounts separately) and forecasted test period by
4		account number, explain why these amounts differ from "actual" amounts,
5		provide all supporting documentation and calculations, and explain why
6		these amounts should be included.
7	е.	For the period 2011 through 2013 YTD, provide the amount paid by Big
8		Rivers to rating agencies regarding the matters in (a) to (c) above, and
9		provide the names of the rating agencies, the amounts paid by account
10		number, a copy of all contracts, and a copy of all reports and
11		recommendations of the rating agency. Identify all amounts included in the
12		base period (show actual and forecasted amounts separately) and forecasted
13		test period by account number, explain why these amounts differ from
14		"actual" amounts, provide all supporting documentation and calculations,
15		and explain why these amounts should be included.
16	f.	Explain if the rating agencies have expressed an opinion or made
17		recommendations regarding various significant issues facing Big Rivers
18		(i.e., loss of Century smelter, status with Alcan smelter and/or loss of its Case No. 2013-00199 Response to AG 1-73 Witness: Billie J. Richert
		D = 0 - C =

Page 2 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		load, depreciation rates, rate case, etc.), and provide all related
2		documentation from rating agencies addressing these matters.
3		
4	Response)	Big Rivers objects to this request on the grounds that it is overly broad and
5	unduly burde	ensome. Big Rivers also objects to this request on the grounds that it seeks
6	information t	hat is irrelevant and not likely to lead to the discovery of admissible evidence.
7	Notwithstand	ling these objections, but without waiving them, Big Rivers states as follows.
8	a.	Please see electronic attachments to this response for copies of all reports,
9		correspondence, and documentation between Big Rivers and rating agencies
10		for the period February 13, 2013 through September 3, 2013. Please see Big
11		Rivers' response to Item 1 of the supplemental request for information by the
12		KIUC dated February 5, 2013, in Case No. 2012-00492 for copies of all
13		reports, correspondence, and documentation between Big Rivers and rating
14		agencies, for the period January 1, 2013 through February 12, 2013. Please
15		see Big Rivers' response to Item 9 of the initial request for information by
16		KIUC dated December 19, 2012, in Case No. 2012-00492 for copies of all
17		reports, correspondence, and documentation between Big Rivers and rating
18		agencies, for the period January 1, 2012 through January 3, 2013. Please see Case No. 2013-00199 Response to AG 1-73 Witness: Rillie J. Richer

Page 3 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		Big Rivers' responses to Item 31 and Item 33 of the initial request for
2		information by the Attorney General dated May 21, 2012, in Case No. 2012-
3		00063 for copies of all reports, correspondence, and documentation between
4		Big Rivers and rating agencies, for the period January 1, 2011 through May
5		21, 2012.
6	b.	Please see Big Rivers' response to subpart (a), above, for copies of the reports,
7		correspondence, and documentation provided by rating agencies to Big
8		Rivers.
9	c.	Please refer to the rating agencies' opinions and reports issued and provided in
10		Big Rivers' responses to AG 1-6 and AG 1-7.
11	d.	For the period 2011 through 2013 YTD, Big Rivers has not made payments to
12		any outside consultants to address matters in subparts (a) to (c), above. Please
13		refer to Tab 49 of the Application in this case for forecasted professional
14		service expenses. The forecasted amounts for outside consultants included in
15		the base period and forecasted test period are not broken out in the level of
16		detail requested. However, if vendors are known, amounts in the forecasted
17		base period and forecasted test period are broken out to specific vendors.

Case No. 2013-00199 Response to AG 1-73 Witness: Billie J. Richert Page 4 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

8	Witness)	Billie J. Richert
7		
6		Big Rivers' responses to AG 1-6 and AG 1-7.
5	f.	Please refer to rating agencies' opinions and reports issued and provided in
4		forecasted base period and forecasted test period.
3		see Big Rivers' response to subpart (d) above for amounts included in the
2		payments to rating agencies regarding the matters in (a) to (c) above. Please
1	e.	For the period 2011 through 2013 YTD, Big Rivers has not made any

Case No. 2013-00199 Response to AG 1-73 Witness: Billie J. Richert Page 5 of 5

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 74)	Reference the Berry testimony at p. 13, where it states load replacement
2	"will require	three or four years to come to full fruition."
3	<i>a</i> .	Explain fully why the length of time necessary to achieve mitigation was not
4		factored into the wholesale and retail contracts with Century and Alcan.
5	<i>b</i> .	Explain why no effort was made to begin mitigation efforts when aluminum
6		prices reached any certain threshold amounts, and why mitigation efforts
7		only began when Big Rivers received Century's termination notice.
8		
9	Response)	
10	a.	When the Unwind negotiations were underway, the wholesale power market
11		was very strong. At the time of the Unwind, the smelters wanted to be
12		customers of Big Rivers to avoid wholesale market prices, thus the trend was
13		expected to continue and Big Rivers believed it would have a viable outlet for
14		any excess energy in the future. The national recession had a significant
L5		impact on electricity consumption throughout the nation. The drastic
L6		downturn in the wholesale market was neither expected nor predicted as a
L7		reasonable possibility by the industry.

Case No. 2013-00199 Response to AG 1-74 Witness: Robert W. Berry Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

14	Witness)	Robert W. Berry
13		
12		LME as an indicator of smelter economic viability.
11		these time periods, Big Rivers does not believe it is reasonable to rely on
10		2012 LME price was \$2,327. Given the variations in LME prices throughout
9		August 2012 and the LME price of aluminum was \$2,046. The December
8		aluminum was \$1,777 per metric ton. Century's notice was received in
7		when the smelters executed their current contracts, the LME price of
6		if and when it occurred. At the time of the Unwind transaction, July 2009,
5		smelters; however, Big Rivers was developing a plan to deal with the situation
4		for Big Rivers to begin mitigation efforts prior to receiving notice from the
3		their contracts and was unable to begin mitigation efforts. It was unfeasible
2		obligation to provide wholesale power to Kenergy to serve the smelters under
1	Ъ.	Until the time of the smelters notice of contract termination, Big Rivers had an

Case No. 2013-00199 Response to AG 1-74 Witness: Robert W. Berry Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 75)	Has Mr. Bailey or anyone else on behalf of BREC spoken to Kenergy CEC
2	Starheim and	d the other member CEOs about the anticipated member retail impacts of the
3	proposed rev	enue increase in this case? Please provide copies of any and all
4	corresponder	nce, reports and/or any related documents in this regard.
5		
6	Response)	Yes. Please see the attached electronic file(s).
7		

Mark A. Bailey

Witness)

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 76)	Reference the Bailey testimony, p. 5, l. 16-19. Please show the calculations
2	necessary, ar	nd identify where in the application the calculations can be located) to
3	establish Mr.	Bailey's statement that "temporarily" laying up another generating plant will
4	be "able to o	ffset most of the revenue needed to make up for the Alcan contract
5	termination"	• •
6	a.	State Big Rivers' current anticipation of when (what year) it would restart
7		Wilson Station based on Big Rivers' implementation and operation of its
8		"Mitigation Plan," assuming no "must run" status.
9	<i>b</i> .	State Big Rivers' current anticipation of when (what year) it would restart
10		Coleman Station based on Big Rivers' implementation and operation of its
11		"Mitigation Plan," assuming no "must run" status.
12		
13	Response)	Please see the attachment to this response for the layup savings. Because
14	Wilson Statio	on is intended to be laid-up in response to the Sebree smelter termination, the
15	costs associa	ted with operating Wilson Station were excluded from the "O&M" worksheet
16	for incorpora	tion of the labor & non-labor reductions, the "PCM" worksheet for variable
17	costs, and the	e "Fuel" worksheet for fuel expense in the financial model produced in response
18	to PSC 1-57.	

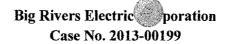
Case No. 2013-00199 Response to AG 1-76 Witness: Robert W. Berry Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

4	Witness)	Robert W. Berry
3		
2	b.	Please see Big Rivers' response to PSC 2-14.
1	a.	Please see Big Rivers' response to PSC 2-14.



Attachment for Response to AG 1-76

Plant Layup Savings (\$ millions)

Alcan Revenue Loss	\$ 155
Savings:	
Variable Costs	
Wilson Non-Labor Expenses	
Wilson Labor Reduction	\$ 11
Total Savings	

Deficiency after Savings

Case No. 2013-00199
Attachment for Response to AG 1-76
Vitness: Robert W. Berry
age 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item //)	break down the \$40.7 million in Alcun contribution to big Rivers costs,	
2	per Bailey te	stimony at page 5, line 23, into the revenue requirement components of	
3	depreciation	, interest, operating expenses, other expenses, plant assets, accumulated	
4	depreciation, and all other rate base and revenue requirement components. Provide the		
5	amounts included in the base period (show actual and forecasted amounts separately) and		
6	the forecasted test period by account number and provide all supporting documentation		
7	and calculations.		
8			
9	Response)	Please see Big Rivers' response to AG 1-84.	
10			
11	Witness)	John Wolfram	

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 78)	Please refer to the Bailey testimony at page 9, line 7 where it states the
2	Century "co	ntracts should have no financial impact on this case at this time." (Emphasis
3	added.)	
4	a.	Describe in detail why it is necessary for Mr. Bailey to qualify this statement
5		with "at this time."
6	b.	The need to qualify this statement suggests that there may be a time at
7		which the contracts will have a financial impact. Describe in detail when
8		and under what circumstances the contracts would have a financial impact.
9		
10	Response)	As stated on page 9, line 6 of Mr. Bailey's testimony, the reason for this
11	statement is	found in the testimony of Robert W. Berry. Please refer to that testimony,
12	Application '	Tab 63, page 16:17 through page 17:21. Also please refer to Big Rivers'
13	response to A	AG 1-1 in Case No. 2013-00221.
14		
15	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 79)	Please refer to the Bailey testimony at page 6, line 11 where it states access
2	to the capita	l markets will be on "a limited basis at first."
3	<i>a</i> .	Describe in detail what Big Rivers means by a "limited basis" for access to
4		capital markets. If assumptions are necessary, state the assumptions.
5		i. In what ways will access to capital be limited?
6		ii. State to the best of Big Rivers' knowledge precisely what those limits
7		will be for the next two years.
8	<i>b</i> .	Big Rivers further qualifies the statement by "at first." State how long this
9		"at first" period is anticipated by Big Rivers to last.
10		
11	Response)	
12	a.	Please see below for an explanation of the "limited basis" for access to capital
13		markets.
14		i. Accessing capital markets for long-term financing encompasses
15		having access to public financing; private placements; asset-based
16		lending; leveraged financing; syndicated financing, issuance of high
17		grade and high yield debt. Big Rivers has limited availability to access
18		each of these types of financing vehicles, at a cost-effective rate, due

Case No. 2013-00199 Response to AG 1-79 Witness: Billie J. Richert Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		to the present credit ratings issued by the three major rating agencies;
2		the uncertainty surrounding the outcome of the pending rate cases; and
3		the 850 MW load reduction stemming from the smelters' termination
4		notices.
5		ii. See Big Rivers' response to subpart (a)(i), above. Over the next two
6		years, Big Rivers' access to the full complement of capital market
7		opportunities could be limited to costly private placements for high-
8		risk investments resulting largely from the lack of a minimum of two
9		investment grade ratings and questions regarding the regulatory
10		support that will be afforded to Big Rivers.
11	b.	Please see Big Rivers' response to subpart (a)(ii) above.
12		
13	Witness)	Billie J. Richert

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 80)	Reference the Bailey testimony at p. 6, l. 11-12. Identify which specific
2	capital mark	ets BREC will be able to access if it is granted the full amount of revenue it
3	seeks in the	instant case.
4		
5	Response)	Please see Big Rivers' response to AG 1-79.
6		
7	Witness)	Rillie I Richert

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 81)	Reference the Bailey testimony at p. 10, l. 12-14. Provide a breakdown of the
2	retail rate in	crease based on retail customer usages of 800 kWh, 900 kWh, 1000 kWh,
3	1100 kWh, 1	200 kWh, 1400 kWh and 1500 kWh.
4		
5	Response)	Please refer to the Direct Testimony of John Wolfram, Exhibit Wolfram-7.
6		

John Wolfram

7

Witness)

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 82)	Reference the Bailey testimony p. 15, l. 8-10. What methods designed to put
2	BREC "on a	path of recovery" other than rate increases has BREC explored? If none,
3	explain in co	mplete detail why not.
4		
5	Response)	In designing its rates and planning for its operations after Century's and/or
6	Alcan's termi	nation, Big Rivers planned for long-term success and developed an operational
7	strategy likely	y to produce long-term benefits to its Members and their member-owners. To
8	address the lo	ong-term interests of its Members, Big Rivers researched and developed its
9	mitigation pla	an over the past several years to help mitigate the adverse financial
10	consequences	s of a potential smelter closure. Now that both smelters have given notice of the
11	termination o	f their contracts, Big Rivers is implementing the mitigation plan not only to
12	increase rever	nues to address its immediate financial needs, but also to reduce the long-term
13	impact of the	resulting rate cases on its Members.
14	For th	e continued benefit of its Members, and consistent with the Commission's
15	expectations	set forth as part of the Unwind Transaction, Big Rivers has approached this
16	question of av	vailable generation capacity resulting from the termination of the smelter
17	contracts as a	unique opportunity to benefit its Members.

Case No. 2013-00199 Response to AG 1-82 Witness: Mark A. Bailey Page 1 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1	Big Rivers has identified numerous opportunities in the medium- and long-term
2	markets and has in fact pursued numerous requests for proposal to provide power to other
3	utilities, both in Kentucky and in other states. Medium- and long-term firm power sales
4	contracts will obviously command a premium over current, day-ahead and hourly prices.
5	Similarly, Big Rivers reasonably anticipates an eventual increase in off-system sales revenue
6	as indicated by its research on the likely effects of MATS compliance on older coal-fired
7	generation in the region, as well as the likely trajectory of the cost of coal generation relative
8	to the costs of natural gas generation.
9	Big Rivers has also explored and continues to actively explore the possibility of
10	selling certain generation assets. It is currently engaged in discussions with multiple entities
11	about the possible sale of the Wilson Station or the Coleman Station, and it has set a price on
12	both plants.
13	In addition to the cost savings and potential revenue increases resulting from the
14	possible idling or sale of a power plant, Big Rivers also expects to increase revenues by
15	marketing its available generation capacity in order to increase off-system sales. Big Rivers
16	has invested significant time and energy into researching the market and developing its off-
17	system sales plan. Based on this research, Big Rivers reasonably anticipates that increased
18	off-system sales will benefit its Members and their member-owners when wholesale Case No. 2013-00199

Response to AG 1-82 Witness: Mark A. Bailey

Page 2 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	electricity prices have recovered from their current slump, currently expected to occur around
2	2019.
3	Big Rivers is actively pursuing bilateral sales and wholesale power agreements to
4	take advantage of those opportunities. Big Rivers has already responded to multiple requests
5	for proposal and initiated informal discussions with still other potential counterparties. Big
6	Rivers is also able to pursue interstate opportunities due to its participation in Midcontinent
7	Independent System Operator, Inc. ("MISO").
8	Please also see the response to PSC 2-16.
9	
10	Witness) Mark A. Bailey

Case No. 2013-00199 Response to AG 1-82 Witness: Mark A. Bailey Page 3 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 83) Reference the Bailey testimony at p. 15, l. 15-17. If BREC is not granted all
2	the rate relief it requested in both the Century rate case and the instant case, describe any
3	and all methods BREC is prepared to pursue to avoid having to file for bankruptcy
4	reorganization.
5	
6	Response) Big Rivers objects that this request seeks information subject to the attorney-
7	client and attorney work product privileges. Notwithstanding this objection, but without
8	waiving it, Big Rivers states that if it is not granted the rate relief requested in Cases No.
9	2012-00535 and 2012-00199 (the "Rate Cases"), it will evaluate its circumstances at that
10	time. Absent further information regarding the consequences of the Commission's orders in
11	the Rate Cases, the status of Big Rivers' Load Concentration Analysis and Mitigation Plan at
12	that time, and any other regulatory matters that may be pending or approaching, this request
13	cannot be answered. For purposes of clarity, Big Rivers remains opposed to bankruptcy, and
14	it believes that bankruptcy does not serve the best interests of its members.
15	
16	Witness) Mark A. Bailey

Case No. 2013-00199 Response to AG 1-83 Witness: Mark A. Bailey Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 84) Reference Mr. Bailey's testimony at p. 4, l. 16-18 where he states that the	he	
2	rate relief Big Rivers is seeking in this case is necessary to replace the net revenues th	at	
3	Big Rivers will lose beginning January 31, 2014 as a result of the termination of Alcan.		
4	Also, at p. 5, line 21 he identifies \$70.4 million in new revenues that Alcan will need v	vhen	
5	the Alcan contract termination takes effect, and at p. 5, l. 23 and p. 6., l.1-2 he explain	ıs	
6	that the \$70.4 million in new revenues consists of Alcan's contribution to Big Rivers'	costs	
7	of about \$46.7 million and a portion of Century revenues allocated to Alcan in the Ce	ntury	
8	rate case of about \$23.7. Address the following:		
9	a. Mr. Bailey's testimony gives the impression that the entire \$70.4 million	n in	
10	new revenues requested in this rate case, Case No. 2013-00199 ("CN		
11	00199") is related to the loss of Alcan revenues, but if this is the case th	ien	
12	why is it necessary to change or revise all other costs included in this		
13	revenue requirement in this case compared to the forecasted revenue		
14	requirement in the prior rate case, Case No. 2012-00535 ("CN 00535"))?	
15	Why didn't Big Rivers merely take the forecasted revenue requirement	from	
16	the prior rate case and add in the \$68.6 million of revised requested rela	ief	
17	from the prior rate case, and then only make adjustments to costs in thi	s	
18	rate case only related to the loss of Alcan? Explain why this would not	have	

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 1 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

	been an easier and more cost effective and efficient manner of filing this
	rate case.
<i>b</i> .	Mr. Bailey's testimony gives the impression that the entire \$70.4 million in
	new revenues requested in this rate case is related to the loss of Alcan
	revenues, but isn't BREC also seeking rate relief based for other costs based
	on changes to forecasted amounts that vary from historical amounts?
	Explain why it is necessary to propose and seek increases in other costs in
	this rate case if the entire rate case is supposedly only related to the loss of
	Alcan revenues of \$70.4 million as claimed by Mr. Bailey.
с.	Explain where the requested revised rate relief revenues of \$68.6 million
	from the prior rate case are included in this rate case and show amounts by
	account number for the base period (show actual and forecasted amounts
	separately) and the forecasted test period. Alternatively, explain why Big
	Rivers did not include these new revenues in this rate case if it is supposedly
	only based on the loss of just Alcan, and not based on the prior loss of
	Century also. Provide supporting documentation and calculations.
d.	Identify all overlap of revenues and costs related to the loss of Century in
	the prior rate case CN 00535 and the loss of Alcan in the current rate case
	c.

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 2 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		CN 00199, and show all amounts by account number and for the base
2		period (show actual and forecasted amounts separately) and the forecasted
3		test period. Provide supporting documentation and calculations and explain
4		why this overlap of costs is reasonable and does not represent double-
5		recovery of the same type of costs in both of these rate cases.
6	е.	Regarding Alcan's contribution to Big Rivers' costs of about \$46.7 million
7		and a portion of Century revenues allocated to Alcan in the Century rate
8		case of about \$23.7 million, provide these Alcan-specific costs by account
9		number and description in the base period (show actual and forecasted
10		amounts separately) and forecasted test period and provide all related
11		supporting documentation and calculations.
12	f.	Regarding the portion of Century revenues allocated to Alcan in the
13		Century rate case of about \$23.7 million, show these amounts of revenues
14		and costs by account number that were included in the base period (show
15		actual and forecasted amounts separately) and forecasted test period of the
16		prior rate case CN 00535, and provide related supporting documentation
17		and workpapers.

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 3 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	g.	Explain why the \$23.7 million of Century revenues allocated to Alcan in the
2		Century rate case is not an overlap of amounts that BREC included in its
3		revised requested revenues of \$68.6 million in the prior rate case CN 00535
4		and explain why this does not represent a double-recovery of costs in this
5		rate case CN 00199 and the prior rate case 00535. Provide all supporting
6		documentation and calculations.
7		
8	Response)	Big Rivers objects that these requests are argumentative and that Mr. Bailey
9	did not testif	y that Alcan would need new revenues. Notwithstanding this objection, and
10	without waiv	ing the same, Big Rivers states as follows.
11	a.	One reason that Big Rivers did not "merely take the forecasted revenue
12		requirement from the prior rate case and add in the \$68.6 million" plus other
13		adjustments is because doing so would be inconsistent with the applicable
14		statutes. KRS 278.192 provides very specific requirements for which months
15		may be included in the base period and the test period for rate filings using a
16		fully-forecasted test period, and the use of the test period from the last rate
17		case would violate those requirements.

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 4 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

Another reason for Big Rivers' approach is to ensure that the test period reflects the conditions that Big Rivers anticipates for the period of time that the rates will become effective. In other words, the test period financials should be based on the same forecast that Big Rivers relies upon to manage the utility. The goals of producing a forecast that most accurately captures Big Rivers' expectations for future financial and operating conditions, and designing rates that account for those conditions, outweigh the desire to file this case in an "easier" manner.

Also, the termination of the Sebree smelter agreement introduces very significant changes to Big Rivers' operations. It is not feasible for Big Rivers

Also, the termination of the Sebree smelter agreement introduces very significant changes to Big Rivers' operations. It is not feasible for Big Rivers to estimate the effects of the changes resulting from the contract termination – including changes to Big Rivers' load, generation dispatch, idling of power plants, staffing, etc. – and accurately reflect those in pro forma adjustments. The timing differences between the two rate filings and between the two smelter contract terminations exacerbates the difficulty of estimating those adjustments to revenues and expenses.

While the contract termination drives the need for the rate filing, Big
Rivers does include updates to other inputs to its modeling and forecasts, in

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 5 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1 order to reflect the most recent information available, when developing a 2 revised forecast. Big Rivers would have to update all other expenses and 3 revenues, even those not affected by the Sebree smelter contract termination, in order to be consistent with the matching principle and to avoid single-issue 5 ratemaking. These updates may also impact the revenue deficiency proposed 6 in this case relative to any amounts in the previous rate filing. 7 For these reasons, rather than attempting to revise the forecast from the 8 previous rate filing with a patchwork of estimated adjustments, Big Rivers 9 instead developed an updated forecast (which supersedes the previous forecast) for management to use for the operation of the business, and then relied upon that forecast to develop the test period in this rate filing. Big Rivers believes that this approach is the best way to design rates that reflect the conditions that are expected to prevail after January 30, 2014, when the Sebree smelter contract termination takes place and the proposed rates take effect. b. Please see Big Rivers' response to subpart (a), above. The rate relief of \$68.6 million from the prior rate case is included in this c. case, but not in the manner indicated in the question. For the forecasted test

10

11

12

13

14

15

16

17

18

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 6 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

d.

period, the revenue deficiency is determined first by identifying all of Big
Rivers' costs (including the application of target TIER, and including all of
the costs related to both smelter contract terminations), and then comparing
that to the revenues produced by existing rates. The proposed rates from the
last rate filing (which in that case produced \$68.6 million in incremental
revenues relative to the existing rates) were used as the starting point for
revenue calculations in this case. The question implies that those incremental
revenues can be distinguished from other base revenues, which is not the case.
Big Rivers did not simply add an assumed impact from the Sebree smelter
contract termination on top of the revenue requirement from Case No. 2012-
00535. Also, for the base period, the increase from Case No. 2012-00535 is
included in member revenues from August 20, 2013 (the effective date of the
rates proposed in Case No. 2012-00535) through September 30, 2013 (the end
of the base period in this case). All of the revenues are included in Account
447.
There is no "overlap" of revenues and expenses as that term is understood to
be used in the question. The revenue deficiency in this case is based on Big
Rivers' projected revenues and expenses in the forecasted test period. Big

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 7 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		Rivers did not add the revenues and expenses in the forecasted test period in
2		this case on top of the revenues and expenses in the forecasted test period in
3		Case No. 2012-00535. All of the costs are only included once in the test
4		period, so there is no double-recovery.
5	e.	Neither the \$46.7 million nor the \$23.7 million are Alcan-specific costs.
6		Instead, the \$46.7 million is an estimate of the impact of the Sebree smelter
7		contract termination on Big Rivers' revenue deficiency, based on the full
8		amount of the increase sought in this case less the \$23.7 million attributed to
9		the Sebree smelter's share of the increase from Case No. 2012-00535. The
10		\$23.7 million is a proportional amount of the increased revenues provided by
11		the Sebree smelter after the increase in Case No. 2012-00535. During the
12		base period in this case, those increased revenues are a portion of the total
13		revenues provided by the Sebree smelter from August 20, 2013 (the effective
14		date of the proposed increase in Case No. 2012-00535) through September 30
15		2013 (the end of the base period). The revenue increase is included in
16		Account 447. Since the Sebree smelter's contract terminates prior to the
17		forecasted test period, these increased revenues are not included in the test
18		period.

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 8 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	f.	The base period in Case No. 2012-00535 was May 1, 2012-April 30, 2013.
2		The increase proposed in that case took effect August 20, 2013. Thus, none of
3		the increase proposed in Case No. 2012-00535 was in the base period.
4		The \$23.7 million is a portion of the total Sebree smelter revenues in
5		the forecasted test period in Case No. 2012-00535. The \$23.7 million
6		represents a proportional amount of the increased revenues from the Sebree
7		smelter resulting from the increase proposed in Case No. 2012-00535. The
8		revenue increase is included in Account 447.
9	g.	There is no "overlap" of revenues as that term is understood to be used in the
10		question. The revenue requirement in this case is not based on Big Rivers'
11		estimate of the impact of the Sebree smelter contract termination or Big
12		Rivers' estimate of the Sebree smelter's share of the increase from Case No.
13		2012-00535 (i.e., in determining the revenue requirement in this case, Big
14		Rivers did not simply add the two estimates together). Instead, Big Rivers
15		determined its revenue requirement in this case based on its revenues and
16		expenses in the forecasted test period, consistent with the requirements of
17		KRS 278.192 and the applicable regulations.

18

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 9 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1 Witness) John Wolfram

Case No. 2013-00199 Response to AG 1-84 Witness: John Wolfram Page 10 of 10

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 85)	Reference Mr. Bailey's testimony at p. 4, l. 16-18 where he states that the
2	rate relief B	ig Rivers is seeking in this case is necessary to replace the net revenues that
3	Big Rivers v	will lose beginning January 31, 2014 as a result of the termination of Alcan,
4	and at p. 5,	line 21 where he identifies this amount as \$70.4 million. Address the
5	following:	
6	<i>a</i> .	Show the impact of the loss of Century in the prior rate case CN 00535 and
7		compare this to loss of Alcan in the current rate case CN 00199 by account
8		number and type of revenue and cost, and show and compare the impacts
9		for the loss of each of Century and Alcan on all revenues, expenses and rate
10		base components for the base period in each rate case (show actual and
L1		forecasted amounts separately) and the forecasted test period in each rate
12		case.
l.3	b.	Regarding (a), explain and identify the changes in inputs, assumptions, and
L4		other amounts in the Financial Model that affected the calculation of the
l.5		impacts of the loss of Century compared to the loss of Alcan, and explain
L 6		why these changes were made in the Financial Model for calculating the
17		impact of loss of Century versus the loss of Alcan. In all cases, explain why
.8		these changes in inputs and assumptions were made to the Financial Model

Case No. 2013-00199 Response to AG 1-85

Witnesses: John Wolfram, Christopher A. Warren

Page 1 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		for calculating the impact of the loss of Century compared to the loss of
2		Alcan.
3	с.	Regarding (b), quantify and explain this difference in cost showing the loss
4		of Century using the assumptions in the Financial Model for the Alcan loss
5		calculation in this case CN 00199. Provide related supporting
6		documentation and calculations and citations to all changes in the
7		Financial Model by specific field, row, column, tab, and other reference.
8	d.	Regarding (b), quantify and explain this difference in cost showing the loss
9		of Alcan using the assumptions in the Financial Model for the Century loss
LO		calculation in the prior rate case CN 00535. Provide related supporting
11		documentation and calculations and citations to all changes in the
12		Financial Model by specific field, row, column, tab, and other reference.
13		
L4	Response)	Big Rivers objects that this request is overly broad and unduly burdensome.
15	Notwithstand	ling this objection, and without waiving it, Big Rivers responds as follows.
l6	a.	Big Rivers does not have the requested analysis. The data for the requested
L7		comparison of each rate case "impacts" by account number and type of
.8		revenue and cost for the base periods and test periods is not available. For the

Case No. 2013-00199 Response to AG 1-85 Witnesses: John Wolfram, Christopher A. Warren Page 2 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

.7	Witnesses)	John Wolfram, Christopher A. Warren
16		
.5		applicable to the last rate case are not applicable to this rate case.
.4	d.	Big Rivers does not have the requested analysis because the assumptions
L3		applicable to this rate case are not applicable to the last rate case.
l2	c.	Big Rivers does not have the requested analysis because the assumptions
l1		276, and AG 1-287.
10		subpart (a) above. Also, please see Big Rivers' responses to AG 1-86, AG 1-
9	b.	Big Rivers does not have the requested analysis; see Big Rivers' response to
8		are possible; see Big Rivers' responses to AG 1-86, AG 1-276, and AG 1-287
7		Alcan" in this case. However, certain comparisons of data from the two cases
6		"impact of the loss of Century" in the last case to the "impact of the loss of
5		retained both smelters and both units, so it is not possible to compare the
4		plants were idled. Neither filing included the preparation of a forecast that
3		prepared assuming that both smelter contracts were terminated and that two
2		was terminated and that a plant was idled. For this rate case, the forecast was
1		last rate case, the forecast was prepared assuming that the Century contract

Case No. 2013-00199 Response to AG 1-85 Witnesses: John Wolfram, Christopher A. Warren Page 3 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 86)	Reference Mr. Bailey's testimony at p. 4, l. 16-18 where he states that the
2	rate relief B	ig Rivers is seeking in this case is necessary to replace the net revenues that
3	Big Rivers w	will lose beginning January 31, 2014 as a result of the termination of Alcan. Is
4	it BREC's c	ontention that this entire rate case is related only to the loss of Alcan
5	revenues? Ij	f not, please explain. Regardless, address the following:
6	a.	The forecasted test period in the prior rate case CN 00535 was for the period
7		September 1, 2013 through August 31, 2014, and the forecasted period in
8		this case CN 00199 is for the period February 1, 2014 (date of Alcan
9		termination) through January 28, 2015. There is an overlap of the same
10		seven months of February 2013 through August 2013 in the forecasted test
11		periods of these two cases. Provide the forecasted test period revenues,
12		expenses, interest expense, taxes, depreciation (and all other expenses) and
13		plant investment, accumulated depreciation, long-term debt (and all other
14		rate base components) by account number in the prior rate case CN 00535
15		for each month February 2013 through August 2013, and compare to the
16		amounts for the same revenues, expenses, and rate base components in the
17		current rate case CN 00199 for the same forecasted test period months of
18		February 2013 through August 2013 and explain the reasons for all
19		differences in amounts for each revenue, expense, and rate base component
		Case No. 2013-00199

Response to AG 1-86 Witnesses: Jeffrey R. Williams and John Wolfram

Page 1 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Commission Staff's Initial Request for Information dated August 19, 2013

September 3, 2013

1		by account number and major cost element (revenues, cost of fuel, payroll,
2		depreciation, taxes, rate case expense, profession fees, etc.). In all cases,
3		explain and quantify the changes in inputs, assumptions, and all other
4		changes to the Financial Model that caused a change in these amounts and
5		explain why it was necessary to change assumptions and inputs to the
6		Financial Model for the same months in forecasted test period of prior rate
7		case CN 00535 compared to the current rate case CN 00199. Provide
8		related supporting documentation and calculations and citations to all
9		changes in the Financial Model by specific field, row, column, tab, and
10		other reference.
11		
12	Response)	Big Rivers' position is that the driver for the instant filing is the Alcan smelter
13	contract term	ination. However, the fully forecasted test period does include updates to other
14	parameters (consistent with the requirements set forth in 807 KAR 5:001 Section 16) which
15	may affect th	e revenue deficiency calculation in this case. Please see Big Rivers' response to
16	AG 1-230.	
17	a.	Big Rivers agrees that there are seven months, February 2014 through August
18		2014, in common in the forecasted test periods of these two cases. The

Case No. 2013-00199 Response to AG 1-86 Witnesses: Jeffrey R. Williams and John Wolfram Page 2 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Commission Staff's Initial Request for Information dated August 19, 2013

September 3, 2013

CONFIDENTIAL attachment, which is provided pursuant to a petition for
confidential treatment, to this response provides a comparison of revenues and
expenses included in these seven months, along with an explanation where
applicable. The revenues and expenses included here tie to the amounts
included in the Big Rivers Financial Model that was used to develop the
revenue deficiency calculation for this case, therefore no pro forma
adjustments are included. The attachment lists the information by revenue or
expense item category, not by account number, consistent with Big Rivers'
budget variance analyses. However, the attachment also provides the
worksheet and row reference in the Big Rivers Financial Model where the
revenues and expenses are located by account number.

It was necessary to change certain assumptions for this filing, even though there are seven months in common with the last rate case filing. This is so because it is prudent for Big Rivers' forecast to reflect its most up-to-date expectations for budgeting purposes, and 807 KAR 5:001 Section 16 requires that the forecast in the rate filing contain the same assumptions and methodologies as used in the forecast prepared for use by management. The

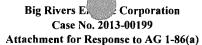
Case No. 2013-00199 Response to AG 1-86 Witnesses: Jeffrey R. Williams and John Wolfram Page 3 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Commission Staff's Initial Request for Information dated August 19, 2013

September 3, 2013

4	Witnesses)	Jeffrey R. Williams, John Wolfram
3		
2		Williams.
1		forecast development is discussed in the Direct Testimony of Mr. Jeffrey R.



ttachment for Response to AG 1-866. 7 Month Overlap

	Feb 14 - Aug 14	Feb 14 - Aug 14			Worksheet and Row Reference In Financial Model
	CN 2012-00535	CN 2013-00199	Difference	Explanation	By Account Number
Revenues	011 2012 00000	011 2010 00100	Difference	Explanation	by / cooding realists
Rural	105,988,908	135,545,345	29,556,437	Rate Increase	Trial Bal, Row 464
Large Industrial	32,097,920	43,885,311	11,787,391	Rate Increase	Trial Bal, Row 465
Smelter	110,696,569	0	(110,696,569)	Contract Termination	Trial Bal, Row 466
Off-System/Other	7,10,000,100		(110,000,000)		Trial Bal, Row 468
Other Electric Revenue-Power Supply	1,254,169	1,232,000	(22, 169)		O&M, Row 63
Rent from Electric Property	14,000	14,000	(22,100)		O&M, Row 64
Other Electric Revenues	885,500	879,200	(6,300)		O&M, Row 64
Total Operating Revenues & Patronage Capital	003,000	073,200	(0,000)		Calvi, Nov 64
Cost of Electric Service					
Fuel				Idling Plant	Fuel, Rows 39-49
Reagent & Allowances				Idling Plant	PCM, Rows 121-135, 140
Purchased Power				Variable Flow Through	PCM, Rows 146-148
Non-FAC PPA - NonSmelter				Variable Flow Through	Regulatory Charge, Row 62
Power Supply Transmission Reservation				MISO Transmission Rate Increase	O&M, Row 65
PJM	5,150	0	5,150		·
Production Expense Non-Labor	0,100		5,,00	Savings from plant idling	O&M, Rows 127-129, 131-132, 135-139, 142
Emission Fees				Lower generation from idling plant	O&M, Rows 130 and 143
MISO Administrative Fees	1,401,489	1,115,957	285,532	Savings from plant idling	O&M. Rows 119-121
ACES FEES	1,321,831	1,326,981	(5,150)	oamiga nom premi romig	O&M, Row 60
TVA Transmission Fees	1,021,001	1,020,001	(0,100)	TVA transmission rate increase	O&M, Row 61
FDE (Excluding Production O&M)				TVT (Fariorings)on rate into see	O&M, Rows 18-55, 106-109, 113-116
Labor	34,596,487	31,128,150	3,468,338	Savings from staffing redutions	O&M, Rows 149-179
Property Tax	2,454,410	2,460,521	(6,111)	Caringo ironi staning reducent	O&M, Rows 84-94
Insurance	2,275,889	2,275,889	(0,111)		O&M, Rows 70-77
Line of Credit Fees	26,870	11,492	15,378		O&M. Row 198
Amortization of upfront LOC Fees	214,295	178,907	35,388		O&M, Row 196
Amortize Environmental Compliance Plan Expenses	149,545	149,210	335		Regulatory Charge, Row 63
Amortize Rate Case Expenses	308,384	581,798	(273,414)	2013-00199 Rate Case expenses	Regulatory Charge, Row 63
Amortize Rate Case Expenses Amortize Severance Package Expenses	536,667	968,333	(431,667)	2nd Plant Idling Severence Payout	Regulatory Charge, Row 64
HMPL G&A Agreement	334,084	334,084	(431,007)	2nd Flank idning Severence r ayout	O&M. Row 197
Hanson Lease	3,220	3,222	=		O&M, Rows 9-10
Depreciation & Amortization Expense	27,834,143	28,185,005	(2) (350,862)		Capex & Depr, Rows 37-51
	27,634,143 885	· ·	(330,802)		O&M, Row 99
Other Taxes		885	•	Cariana francisco	Debt (Row 160) and Pat.(Row 44)
Interest on Long-Term Debt	27,448,333	25,379,237	2,069,096	Savings from refinance	Debt, Row 1007
Interest Charged to Construction-Credit Other Deductions	(1,837,786) 282,242	(1,720,113) 307,447	(117,673) (25,205)		Debt, Row 167 Debt, Row 162
Total Cost of Electric Service					
Operating Margins					
Interest Income	1,142,695	1,073,818	(68,877)		Interest (Row 38) and Pat.(Row 43)
Other Capital Credits & Pat. Dividends	2,706,448	1,723,991	(982,457)	Timing of CFC Patronage	Pat.(Row 45)

Case No. 2013-00199 Attachment for Response to AG 1-86(a) Witnesses: Jeffrey R. Williams, John Wolfram Page 1 of 1

Net Patronage Capital or Margins

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 87)	Reference Mr. Bailey's testimony at p.6, l. 2-16 where he states the rate
2	relief from t	the prior rate case and for this rate case will be sufficient for Big Rivers to
3	prudently of	perate, maintain its generating units, satisfy its loan agreements, attract capital
4	and be well	positioned for the future. Address the following:
5	<i>a</i> .	Provide a cash flow analysis for the actual FY 2011, actual FY 2012, actual
6		2013 YTD, base period (showing actual and forecasted amounts separately),
7		forecasted test period and forecasted 2016, that shows beginning cash and
8		equivalents and reserve funds (identify amounts by account name and
9		description, and identify reserve funds separately), cash flows in to
10		operations, cash flows out of operations, and ending cash balance and
11		equivalents and reserve funds (identify amounts by account name and
12		description and identify reserve funds separately).
13	b.	Regarding (a) above, show all detailed amounts by line item, including (but
14		not limited to) the following: beginning cash and equivalents and economic
15		reserve funds plus positive cash flows (cash sources flowing in to the
16		operations) related to rate relief/new revenues from prior rate case CN
17		00535, energy revenues, proceeds from economic reserve fund, proceeds
18		from rural economic reserve funds (and proceeds from all other reserve

Case No. 2013-00199 Response to AG 1-87 Witness: Billie J. Richert Page 1 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		funds), cash from debt and outside financing, cash from investments, and
2		all other cash in-flows (provide type and description). Also, show negative
3		cash flows (cash sources flowing out of the operations), all cash flow
4		expenses by type of expense, interest expense, principal payments on debt
5		(by type of debt), debt issuance costs, investments, capital expenditures, and
6		all other cash out-flows (provide type and description). Provide related
7		supporting documents and calculations.
8	с.	Regarding (b) above, show the cash flow analysis under two scenarios: i)
9		assuming Big Rivers receives all of its requested rate relief in prior rate case
10		CN 00535, and show impacts for each specific period; and ii) assume that
11		Big Rivers does not receive any rate relief from rate case CN 00535 and
12		show impacts for each specific period.
13	d.	Regarding (b) above, show the cash flow analysis under two scenarios: i)
14		idling both Wilson and Coleman as Big Rivers proposes in this case (show
15		Wilson and Coleman impacts separately); and ii) neither Wilson nor
16		Coleman is idled.
17	e.	Regarding (b) above, explain and show how this supports Mr. Bailey's
18		testimony.

Case No. 2013-00199 Response to AG 1-87 Witness: Billie J. Richert Page 2 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	f.	Regarding (a) and (b) above, compare cash flow analysis for this rate case
2		compared to the periods for cash flow in the prior rate case CN 00199 at the
3		"Statement of Cash Flows" at Tab 31, Attachment 3, page 4 of 10,
4		sponsored by Ms. Speed. Explain the response for all changes in cash flow
5		amounts and assumptions and provide related supporting documentation
6		and calculations.
7		
8	Response)	Big Rivers objects that this request is overly broad and unduly burdensome.
9	Notwithstand	ling this objection, and without waiving it, Big Rivers responds as follows.
10	a.	Please refer to Tab 32 of the Application in this case for the audited cash flow
11		statements for FY 2011 and FY 2012 included in Big Rivers' 2012 Annual
l2		Report. Please see the attached document for the YTD 2013 cash flow
l3		statement as of June 30, 2013. Please refer to Tab 28, Section 16(12)(h)(Item
L 4		#3) of the Application in this case for forecasted cash flow statements for
15		years 2013 through 2016. Cash flow analysis for the base period (Oct 2012-
.6		Sep 2013) was not part of the filing requirement and has not been performed.
L 7		Please refer to the Big Rivers Financial Model, on the "Stmts RUS"

Case No. 2013-00199 Response to AG 1-87 Witness: Billie J. Richert Page 3 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		works	heet (rows 193-300), which was provided in response to PSC 1-57, for
2		month	ly cash flow analysis for the forecasted test period.
3	b.	See B	ig Rivers' response to subpart (a) above. Big Rivers further objects that
4		this re	quest is overly broad and unduly burdensome because Big Rivers does
5		not, in	the ordinary course of business, maintain its records in the manner
6		reques	eted.
7	c.	Cash i	low analysis has been provided in the financial model in Big Rivers'
8		respor	ase to PSC 1-57 and in Tab 28 Section 16(12)(h)(Item #3) of the
9		Applio	cation in this case. The cash flow analysis assuming that Big Rivers
10		does n	ot receive any rate relief in Case No. 2012-00535 has not been
11		perfor	med.
12	d.		
13		i.	The cash flow analysis discussed in Big Rivers' response to subpart
L4			(c), above, includes the idling of both Wilson and Coleman in this
15			case.
16		ii.	The revenues and expenses from operating the Coleman and Wilson
17			locations are not included in this case; therefore the cash flow analysis
18			with those units running has not been performed.

Case No. 2013-00199 Response to AG 1-87 Witness: Billie J. Richert Page 4 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	e.	The rate relief sought in this case results in positive cash flows from
2		operations as shown in Big Rivers' response to subpart (a), above, which
3		supports Mr. Bailey's testimony.
4	f.	Big Rivers does not possess a cash flow analysis comparing this rate case to
5		the prior rate case. Cash flow statements were provided in the Application for
6		each rate case and can be found for Case No. 2012-00535 in Tab 31 Section
7		10(9)(h)(Item #3) and for Case No. 2013-00199 in Tab 28 Section
8		16(12)(h)(Item #3).
9		
10	Witness)	Billie J. Richert

Case No. 2013-00199 Response to AG 1-87 Witness: Billie J. Richert Page 5 of 5

Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-87(a) Statement of Cash Flows

BIG RIVERS ELECTRIC CORPORATION Statement of Cash Flows For The Quarter Ended June 30, 2013 In Thousands \$

For The Quarter Ended June 30, 2013				
In Thousands \$	Three Months En	ided June 30,	Six Months Ended June 30,	
	2013	2012	<u> 2013</u>	2012
CASH FLOWS FROM OPERATING ACTIVITIES:			•	
Net margin	4,170	3,739	13,692	1,635
Adjustments to reconcile net margin to net cash provided by	-	·	•	•
operating activities:				
Depreciation and amortization	11,826	11,017	22,946	22,015
Interest compounded - RUS Series B Note	1,911	1,800	3,775	3,574
Interest compounded - RUS Series A Note	11	0	22	7,596
Noncash Member Rate Mitigation Revenue	(6,1 36)	(6,270)	(12,923)	(11,980)
Changes in certain assets and Babilities:				
Accounts receivable	751	(1,683)	1,968	468
Inventories	(7,833)	(959)	(4,168)	(2,532)
Prepaid expenses	1,896	483	1,784	2,101
Deferred charges	(516)	28	(985)	57
Accounts payable	(830)	(5,899)	(4,639)	(7,316)
Accrued expenses	2,676	2,918	(996)	187
Other Net	693	738	1,169	2,254
Net cash provided by operating activities	8,619	5,912	21,645	18,059
CASH FLOWS FROM INVESTING ACTIVITIES:				
Capital expenditures net	(9,547)	(9,106)	(15,334)	(21,105)
Proceeds from Restricted Investments and Other Deposits	16,087	5,678	20,702	10,394
and Investments				
Net cash used in investing activities	6,540	(3,428)	5,368	(10,711)
CASH FLOWS FROM FINANCING ACTIVITIES:				
Principal payments on long-term obligations	(64,500)	(3,990)	(70,147)	(3,990)
Proceeds from long-term obligations	0	0	0	0
Principal payments on short-term notes payable	0	0	0	0
Proceeds from short-term notes payable	0	0	0	0
Debt Issuance Cost Bond Refunding	0	(302)	0	(548)
Net cash used in financing activities	(64,500)	(4,292)	(70,147)	(4,538)
NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS	(49,341)	(1,808)	(43,134)	2,810
CASH AND CASH EQUIVALENTS Beginning	116,380	49,467	110,173	44,849
CASH AND CASH EQUIVALENTS Ending	67,039	47,659	67,039	47,659
SUPPLEMENTAL CASH FLOW INFORMATION:				-
Cash paid for interest	8,437	8,672	18,422	11,186
Cash paid in taxes	0	0	0	0



APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 88) Reference Mr. Bailey's testimony at p. 6, l. 20-23, and p. 7, l. 1-20, where he
2	addresses the Economic Reserve and Rural Economic Reserve funds. Address the
3	following:
4	a. Start with the beginning balance of all actual Reserve funds at January 1,
5	2012 provide the requested information through the most recent date in 2013 (and provide
6	continuing updated information), and start with the amount at the beginning of the month,
7	show and explain the use of funds during the month, and show the monthly ending
8	balance. As updates are provided, show the actual amount of rate relief received in prior
9	rate case CN 00535 and explain how this impacts the use (or non-use) of reserve fund
10	balances by month.
11	b. In addition, provide the information in (a) above for each of the months in
12	the base period (show actual and forecasted amounts separately) through the forecasted
13	test period, and forecasted 2016.
14	c. Show the analysis in (b) above under two scenarios: i) assuming Big Rivers
15	receives all of its requested rate relief in prior rate case CN 00535 and show and explain
16	impacts by month on the reserve fund with this assumption; and ii) assume that Big Rivers
17	does not receive any rate relief from rate case CN 00535 and show and explain impacts by
18	month on the reserve fund with this assumption.

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	d.	Show the analysis in (b) above under two scenarios: i) assuming Big Rivers
2	receives all o	f its requested rate relief in this rate case CN 00199; and ii) assuming that Big
3	Rivers does n	ot receive any rate relief in this rate case CN 00199.
4		
5	Response)	
6	a.	To the extent this request seeks continuous or ongoing updates, Big Rivers
7		objects on the grounds that it is overbroad and unduly burdensome; Big Rivers
8		states that it will update its response as required by law, as ordered by the
9		Commission, or as it otherwise deems appropriate. Notwithstanding these
10		objections and without waiving them, Big Rivers responds as follows. Please
11		see the attached document for Reserve Fund beginning balances, use of funds
12		during the month and ending balances from January 1, 2012 through and
13		including July 31, 2013.
14	b.	The information in subpart (a) above is provided on the attachment for each of
15		the months in the base period (actual and forecasted amounts separately)
16		through the forecasted test period, and forecasted 2016.
17	c.	No offset to base rates using the reserve fund was proposed in CN 2012-
18		00535, so the analysis would be the same as the answer to part (b) above.

Case No. 2013-00199 Response to AG 1-88 Witness: Billie J. Richert Page 2 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

4	Witness)	Rillia	e J. Richert
3			
2		ii.	This analysis is provided as an attachment to this response.
1	d.	i.	This analysis would be the same as part (b) above.

Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-88(a) Reserve Funds - January 31, 2012

	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$100,310,266.22	\$62,851,736.18
Accrued Interest	290,916.98	649,093.80
Total	100,601,183.20	63,500,829.98
Interest Accrued		
Gross	64,889.38	128,944.32
(Premium) Amortization	(12,601.77)	(32,389.26)
Net Interest Accrued	52,287.61	96,555.06
Interest Received	204,360.81	0.62
Withdraws -MRSM	(1,741,389.80)	
Ending Balance		
Principal	98,760,635.46	62,819,347.54
Accrued Interest	151,445.55	778,037.50
Total	\$98,912,081.01	\$63,597,385.04

Case No. 2013-00199

Attachment for Response for AG 1-88(a)

Witness: Billie J. Richert

'age 1 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - February 29, 2012

Economic Reserve	Rural Economic Reserve
\$98,760,635.46	\$62,819,347.54
151,445.55	778,037.50
98,912,081.01	63,597,385.04
57,808.61	128,945.21
(11,360.67)	(32,389.26)
46,447.94	96,555.95
65,418.45	773,663.95
(1,820,287.22)	
96,994,406.02	63,560,622.23
143,835.71	133,318.76
\$97,138,241.73	\$63,693,940.99
	\$98,760,635.46 151,445.55 98,912,081.01 57,808.61 (11,360.67) 46,447.94 65,418.45 (1,820,287.22) 96,994,406.02 143,835.71

Case No. 2013-00199 Attachment for Response for AG 1-88(a) Vitness: Billie J. Richert

age 2 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - March 31, 2012

	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$96,994,406.02	\$63,560,622.23
Accrued Interest	143,835.71	133,318.76
Total	97,138,241.73	63,693,940.99
Interest Accrued		
Gross	56,879.10	130,218.45
(Premium) Amortization	(11,564.56)	(33,306.00)
Net Interest Accrued	45,314.54	96,912.45
Interest Received	(15,132.78)	(3,100.31)
Withdraws - MRSM	(1,640,240.32)	
Ending Balance		
Principal	95,327,468.36	63,524,215.92
Accrued Interest	215,847.59	266,637.52
Total	\$95,543,315.95	\$63,790,853.44

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Vitness: Billie J. Richert
age 3 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - April 30, 2012

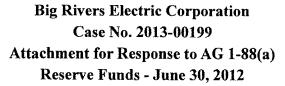
	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$95,327,468.36	\$63,524,215.92
Accrued Interest	215,847.59	266,637.52
Total	95,543,315.95	63,790,853.44
Interest Accrued		
Gross	54,439.88	131,131.26
(Premium) Amortization	(11,070.28)	(34,222.59)
Net Interest Accrued	43,369.60	96,908.67
Interest Received	65,142.38	0.00
Withdraws - MRSM	(1,708,652.00)	
Ending Balance		
Principal	93,672,888.46	63,489,993.33
Accrued Interest	205,145.09	397,768.78
Total	\$93,878,033.55	\$63,887,762.11

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Vitness: Billie J. Richert
age 4 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - May 31, 2012

	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$93,672,888.46	\$63,489,993.33
Accrued Interest	205,145.09	397,768.78
Total	93,878,033.55	63,887,762.11
Interest Accrued		
Gross	42,180.03	131,131.26
(Premium) Amortization	(9,138.42)	(34,222.59)
Net Interest Accrued	33,041.61	96,908.67
Interest Received	70,509.19	0.00
Withdraws - MRSM	(1,657,615.04)	
Ending Balance		
Principal	92,076,644.19	63,455,770.74
Accrued Interest	176,815.93	528,900.04
Total	\$92,253,460.12	\$63,984,670.78

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Vitness: Billie J. Richert
age 5 of 19



	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$92,076,644.19	\$63,455,770.74
Accrued Interest	176,815.93	528,900.04
Total	92,253,460.12	63,984,670.78
Interest Accrued		
Gross	43,431.13	131,131.24
(Premium) Amortization	(8,986.90)	(34,222.59)
Net Interest Accrued	34,444.23	96,908.65
Interest Received	32,406.13	0.00
Withdraws - MRSM	(1,946,348.29)	
Ending Balance		
Principal	90,153,715.13	63,421,548.15
Accrued Interest	187,840.93	660,031.28
Total	\$90,341,556.06	\$64,081,579.43

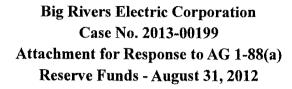
Case No. 2013-00199 Attachment for Response for AG 1-88(a) Vitness: Billie J. Richert

age 6 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - July 31, 2012

Economic Reserve	Rural Economic Reserve
\$90,153,715.13	\$63,421,548.15
187,840.93	660,031.28
90,341,556.06	64,081,579.43
38,509.22	131,131.22
(7,539.47)	(34,222.59)
30,969.75	96,908.63
137,689.82	0.00
(1,971,823.94)	
88,312,041.54	63,387,325.56
88,660.33	791,162.50
\$88,400,701.87	\$64,178,488.06
	\$90,153,715.13 187,840.93 90,341,556.06 38,509.22 (7,539.47) 30,969.75 137,689.82 (1,971,823.94) 88,312,041.54 88,660.33

Case No. 2013-00199 Attachment for Response for AG 1-88(a) Vitness: Billie J. Richert age 7 of 19



	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$88,312,041.54	\$63,387,325.56
Accrued Interest	88,660.33	791,162.50
Total	88,400,701.87	64,178,488.06
Interest Accrued		
Gross	39,034.96	131,131.88
(Premium) Amortization	(7,479.25)	(34,222.59)
Net Interest Accrued	31,555.71	96,909.29
Interest Received	59,639.41	786,788.12
Withdraws - MRSM	(1,755,392.39)	
Ending Balance		
Principal	86,608,809.31	64,139,891.09
Accrued Interest	68,055.88	135,506.26
Total	\$86,676,865.19	\$64,275,397.35

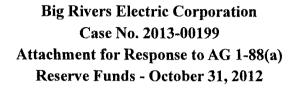
Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Vitness: Billie J. Richert
age 8 of 19

Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-88(a) Reserve Funds - September 30, 2012

Economic Reserve	Rural Economic Reserve
\$86,608,809.31	\$64,139,891.09
68,055.88	135,506.26
86,676,865.19	64,275,397.35
38,872.79	131,131.86
(7,479.25)	(34,222.59)
31,393.54	96,909.27
606.13	0.60
(1,790,954.79)	
84,810,981.40	64,105,669.10
106,322.54	266,637.52
\$84,917,303.94	\$64,372,306.62
	\$86,608,809.31 68,055.88 86,676,865.19 38,872.79 (7,479.25) 31,393.54 606.13 (1,790,954.79) 84,810,981.40 106,322.54

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Vitness: Billie J. Richert
age 9 of 19



	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$84,810,981.40	\$64,105,669.10
Accrued Interest	106,322.54	266,637.52
Total	84,917,303.94	64,372,306.62
Interest Accrued		
Gross	38,702.65	131,131.88
(Premium) Amortization	(7,479.25)	(34,222.59)
Net Interest Accrued	31,223.40	96,909.29
Interest Received	435.99	0.62
Withdraws - MRSM	(1,344,479.90)	
Ending Balance		
Principal	83,459,458.24	64,071,447.13
Accrued Interest	144,589.20	397,768.78
Total	\$83,604,047.44	\$64,469,215.91

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Witness: Billie J. Richert
age 10 of 19

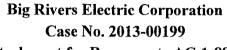
Attachment for Response to AG 1-88(a) Reserve Funds - November 30, 2012

Economic Reserve	Rural Economic Reserve
\$83,459,458.24	\$64,071,447.13
144,589.20	397,768.78
83,604,047.44	64,469,215.91
38,516.55	131,131.86
(7,479.25)	(34,222.59)
31,037.30	96,909.27
26,499.89	0.60
(1,441,083.54)	
82,037,395.34	64,037,225.14
156,605.86	528,900.04
\$82,194,001.20	\$64,566,125.18
	\$83,459,458.24 144,589.20 83,604,047.44 38,516.55 (7,479.25) 31,037.30 26,499.89 (1,441,083.54) \$2,037,395.34 156,605.86

Case No. 2013-00199
Attachment for Response for AG 1-88(a)

Vitness: Billie J. Richert

age 11 of 19

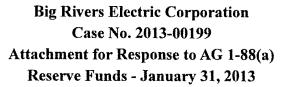


Attachment for Response to AG 1-88(a) Reserve Funds - December 31, 2012

	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$82,037,395.34	\$64,037,225.14
Accrued Interest	156,605.86	528,900.04
Total	82,194,001.20	64,566,125.18
Interest Accrued		
Gross	38,108.63	131,131.88
(Premium) Amortization	(7,479.25)	(34,222.59)
Net Interest Accrued	30,629.38	96,909.29
Interest Received	62,291.97	0.62
Withdraws - MRSM	(1,581,279.44)	
Ending Balance		
Principal	80,510,928.62	64,003,003.17
Accrued Interest	132,422.52	660,031.30
Total	\$80,643,351.14	\$64,663,034.47

Case No. 2013-00199
Attachment for Response for AG 1-88(a)

Vitness: Billie J. Richert age 12 of 19



Economic Reserve	Rural Economic Reserve
\$80,510,928.62	\$64,003,003.17
132,422.52	660,031.30
80,643,351.14	64,663,034.47
30,728.35	131,131.82
(4,550.05)	(34,222.59)
26,178.30	96,909.23
108,317.52	786,788.12
(1,412,276.33)	
79,202,419.76	64,755,568.70
54,833.35	4,375.00
\$79,257,253.11	\$64,759,943.70
	\$80,510,928.62 132,422.52 80,643,351.14 30,728.35 (4,550.05) 26,178.30 108,317.52 (1,412,276.33) 79,202,419.76 54,833.35

Case No. 2013-00199 Attachment for Response for AG 1-88(a) Vitness: Billie J. Richert

age 13 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - February 28, 2013

	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$79,202,419.76	\$64,755,568.70
Accrued Interest	54,833.35	4,375.00
Total	79,257,253.11	64,759,943.70
Interest Accrued		
Gross	22,981.50	131,132.57
(Premium) Amortization	(1,829.58)	(34,222.59)
Net Interest Accrued	21,151.92	96,909.98
Interest Received	49,239.84	1.31
Withdraws - MRSM	(1,902,320.93)	
Ending Balance		
Principal	77,347,509.09	64,721,347.42
Accrued Interest	28,575.01	135,506.26
Total	\$77,376,084.10	\$64,856,853.68

Case No. 2013-00199 Attachment for Response for AG 1-88(a) Vitness: Billie J. Richert

age 14 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - March 31, 2013

	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$77,347,509.09	\$64,721,347.42
Accrued Interest	28,575.01	135,506.26
Total	77,376,084.10	64,856,853.68
Interest Accrued		
Gross	22,391.97	133,113.50
(Premium) Amortization	(1,829.58)	(36,268.09)
Net Interest Accrued	20,562.39	96,845.41
Interest Received	1,337.77	(2,392.76)
Withdraws - MRSM	(2,010,694.44)	
Ending Balance		
Principal	75,336,322.84	64,682,686.57
Accrued Interest	49,629.21	271,012.52
Total Total	\$75,385,952.05	\$64,953,699.09

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Witness: Billie J. Richert
age 15 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - April 30, 2013

Economic Reserve	Rural Economic Reserve
\$75,336,322.84	\$64,682,686.57
49,629.21	271,012.52
75,385,952.05	64,953,699.09
17,772.13	133,318.76
(1,829.58)	(36,268.04)
15,942.55	97,050.72
13,129.08	0.00
(2,051,017.81)	
73,296,604.53	64,646,418.53
54,272.26	404,331.28
\$73,350,876.79	\$65,050,749.81
	\$75,336,322.84 49,629.21 75,385,952.05 17,772.13 (1,829.58) 15,942.55 13,129.08 (2,051,017.81) 73,296,604.53 54,272.26

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Vitness: Billie J. Richert
age 16 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - May 31, 2013

	Economic Reserve	Rural Economic Reserve
Beginning Balance		
Principal	\$73,296,604.53	\$64,646,418.53
Accrued Interest	54,272.26	404,331.28
Total	73,350,876.79	65,050,749.81
Interest Accrued		
Gross	15,929.45	133,318.76
(Premium) Amortization	(2,752.58)	(36,268.04)
Net Interest Accrued	13,176.87	97,050.72
Interest Received	11,796.13	0.00
Withdraws - MRSM	(1,569,851.53)	
Ending Balance		
Principal	71,735,796.55	64,610,150.49
Accrued Interest	58,405.58	537,650.04
Total	\$71,794,202.13	\$65,147,800.53

Case No. 2013-00199
Attachment for Response for AG 1-88(a)
Vitness: Billie J. Richert
age 17 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - June 30, 2013

Economic Reserve	Rural Economic Reserve
\$71,735,796.55	\$64,610,150.49
58,405.58	537,650.04
71,794,202.13	65,147,800.53
14,272.10	133,318.76
(3,675.08)	(36,268.04)
10,597.02	97,050.72
51,539.72	0.00
(1,802,465.90)	
69,981,195.29	64,573,882.45
21,137.96	670,968.80
\$70,002,333.25	\$65,244,851.25
	\$71,735,796.55 58,405.58 71,794,202.13 14,272.10 (3,675.08) 10,597.02 51,539.72 (1,802,465.90) 69,981,195.29 21,137.96

Case No. 2013-00199 Attachment for Response for AG 1-88(a) Vitness: Billie J. Richert

age 18 of 19

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-88(a) Reserve Funds - July 31, 2013

Beginning Balance Principal \$69,981,195.29 \$64,573,882.45 Accrued Interest 21,137.96 670,968.80 Total 70,002,333.25 65,244,851.25 Interest Accrued Gross 14,186.91 133,520.11 (Promiser) Accordination (2,675.08) (2,675.08)		Economic Reserve	Rural Economic Reserve
Accrued Interest 21,137.96 670,968.80 Total 70,002,333.25 65,244,851.25 Interest Accrued Gross 14,186.91 133,520.11	Beginning Balance		
Total 70,002,333.25 65,244,851.25 Interest Accrued 30,002,333.25 65,244,851.25 Gross 14,186.91 133,520.11	Principal	\$69,981,195.29	\$64,573,882.45
Interest Accrued Gross 14,186.91 133,520.11	Accrued Interest	21,137.96	670,968.80
Gross 14,186.91 133,520.11	Total	70,002,333.25	65,244,851.25
•	Interest Accrued		
(Duamium) Amortimation (2.675.09) (26.060.04)	Gross	14,186.91	133,520.11
(25,075.08) (36,208.04)	(Premium) Amortization	(3,675.08)	(36,268.04)
Net Interest Accrued 10,511.83 97,252.07	Net Interest Accrued	10,511.83	97,252.07
Interest Received 579.53 787,829.19	Interest Received	579.53	787,829.19
Withdraws - MRSM (2,088,387.65)	Withdraws - MRSM	(2,088,387.65)	
Ending Balance	Ending Balance		
Principal 67,889,712.09 65,325,443.60	Principal	67,889,712.09	65,325,443.60
Accrued Interest 34,745.34 16,659.72	Accrued Interest	34,745.34	16,659.72
Total \$67,924,457.43 \$65,342,103.32	Total	\$67,924,457.43	\$65,342,103.32

Case No. 2013-00199 Attachment for Response for AG 1-88(a) Vitness: Billie J. Richert

age 19 of 19

Attachment to Response for AG 1-88 (b)

Reserve Fund Balances (In Millions)

Economic Reserve	4	etual 2012 etober	Actual 2012 ovember	Actual 2012 ecember	2	Actual 2013 January	Actual 2013 ebruary	Actual 2013 March	orecast 2013 <u>April</u>	orecast 2013 <u>May</u>
Beginning Balance	\$	84.9	\$ 83.6	\$ 82.2	\$	80.6	\$ 79.3	\$ 77.4	\$ 75.4	\$ 74.0
Interest	\$	-	\$ -	\$ -	\$	_	\$ _	\$ _	\$ -	\$ -
Withdraws (MRSM)	\$	(1.3)	\$ (1.4)	\$ (1.6)	\$	(1.3)	\$ (1.9)	\$ (2.0)	\$ (1.4)	\$ (1.7)
Ending Balance	\$	83.6	\$ 82.2	\$ 80.6	\$	79.3	\$ 77.4	\$ 75.4	\$ 74.0	\$ 72.3
Rural Economic Reserve										
Beginning Balance	\$	64.4	\$ 64.5	\$ 64.6	\$	64.7	\$ 64.8	\$ 64.9	\$ 64.7	\$ 64.7
Interest	\$	0.1	\$ 0.1	\$ 0.1	\$	0.1	\$ 0.1	\$ 0.1	\$ -	\$ 0.1
Withdraws (MRSM)	_\$	-	\$ 	\$ -	\$	-	\$ _	\$ -	\$ -	\$ -
Ending Balance	\$	64.5	\$ 64.6	\$ 64.7	\$	64.8	\$ 64.9	\$ 65.0	\$ 64.7	\$ 64.8

Case No. 2013-00199

Attachment to Response for AG 1-88(b)

Sponsoring Witness: Billie J. Richert

Page 1 of 4

Attachment to Response for AG 1-88 (b)

Reserve Fund Balances (In Millions)

Economic Reserve		orecast 2013 June	F	orecast 2013 <u>July</u>	orecast 2013 August	orecast 2013 ptember	orecast 2013 October	2	ecast 2013 vember	ecast 2013 ecember	:	ecast 2014 unuary
Beginning Balance	\$	72.3	\$	70.1	\$ 67.8	\$ 65.8	\$ 64.0	\$	62.0	\$ 60.0	\$	57.8
Interest	\$	_	\$	-	\$ -	\$ _	\$ _	\$	_	\$ -	\$	-
Withdraws (MRSM)	\$	(2.2)	\$	(2.3)	\$ (2.0)	\$ (1.8)	(2.0)		(2.0)	(2.2)	\$	(3.4)
Ending Balance	\$	70.1	\$	67.8	\$ 65.8	\$ 64.0	\$ 62.0	\$	60.0	\$ 57.8	\$	54.4
Rural Economic Reserve	_											
Beginning Balance	\$	64.8	\$	64.9	\$ 65.0	\$ 65.1	\$ 65.2	\$	65.3	\$ 65.4	\$	65.6
Interest	\$	0.1	\$	0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$	0.1	\$ 0.2	\$	0.1
Withdraws (MRSM)	\$	-	\$	***	\$ 	\$ -	\$ **	\$	-	\$ _	\$	-
Ending Balance	\$	64.9	\$	65.0	\$ 65.1	\$ 65.2	\$ 65.3	\$	65.4	\$ 65.6	\$	65.7

Case No. 2013-00199

Attachment to Response for AG 1-88(b)

Sponsoring Witness: Billie J. Richert

Page 2 of 4

Attachment to Response for AG 1-88 (b)

Reserve Fund Balances (In Millions)

Economic Reserve	2	ecast 2014 bruary	ecast 2014 March	recast 2014 <u>April</u>	Fo	recast 2014 <u>May</u>	F	orecast 2014 June	F	orecast 2014 July	orecast 2014 August	orecast 2014 otember
Beginning Balance	\$	54.4	\$ 44.9	\$ 35.8	\$	27.8	\$	19.2	\$	9.2	\$ _	\$ _
Interest	\$	-	\$ -	\$ -	\$	-	\$	_	\$	_	\$ -	\$ _
Withdraws (MRSM)	\$	(9.5)	\$ (9.1)	\$ (8.0)	\$	(8.6)	\$	(10.0)		(9.2)	\$ _	\$ _
Ending Balance	\$	44.9	\$ 35.8	\$ 27.8	\$	19.2	\$	9.2	\$	-	\$ -	\$ -
Rural Economic Reserve												
Beginning Balance	\$	65.7	\$ 65.8	\$ 65.9	\$	66.0	\$	66.1	\$	66.2	\$ 64.6	\$ 56.3
Interest	\$	0.1	\$ 0.1	\$ 0.1	\$	0.1	\$	0.1	\$	0.1	\$ 0.1	\$ 0.1
Withdraws (MRSM)	\$		\$ 	\$ _	\$	-	\$	_	\$	(1.7)	\$ (8.4)	\$ (6.9)
Ending Balance	\$	65.8	\$ 65.9	\$ 66.0	\$	66.1	\$	66.2	\$	64.6	\$ 56.3	\$ 49.5

Case No. 2013-00199

Attachment to Response for AG 1-88(b)

Sponsoring Witness: Billie J. Richert

Page 3 of 4

Attachment to Response for AG 1-88 (b) Reserve Fund Balances (In Millions)

\$ -
\$ -
\$ -
\$ -

Beginning Balance	\$	49.5	Ф	43.6	\$	27.0	ው	20.7	ው	
	Φ	49.3	Φ	43.0	Ф	37.0	3	28.7	7	-
Interest	\$	0.1	\$	0.1	\$	0.1	\$	-	\$	-
Withdraws (MRSM)	\$	(6.0)	\$	(6.7)	\$	(8.4)	\$	(8.6)	\$	
Ending Balance	\$	43.6	\$	37.0	\$	28.7	\$	20.1	\$	-

Case No. 2013-00199

Attachment to Response for AG 1-88(b)

Sponsoring Witness: Billie J. Richert

Page 4 of 4

Attachment to Response for AG 1-88(d)(ii) Reserve Fund Balances (In Millions)

Economic Reserve	,	ctual 2012 ctober	Actual 2012 vember	Actual 2012 cember	2	Actual 2013 January	,	Actual 2013 bruary	Actual 2013 March	orecast 2013 <u>April</u>	orecast 2013 <u>May</u>
Beginning Balance	\$	84.9	\$ 83.6	\$ 82.2	\$	80.6	\$	79.3	\$ 77.4	\$ 75.4	\$ 74.0
Interest	\$	-	\$ -	\$ -	\$	_	\$	-	\$ -	\$ _	\$ _
Withdraws (MRSM)	\$	(1.3)	\$ (1.4)	\$ (1.6)	\$	(1.3)	\$	(1.9)	\$ (2.0)	(1.4)	(1.7)
Ending Balance	\$	83.6	\$ 82.2	\$ 80.6	\$	79.3	\$	77.4	\$ 75.4	\$ 74.0	\$ 72.3
Rural Economic Reserve											
Beginning Balance	\$	64.4	\$ 64.5	\$ 64.6	\$	64.7	\$	64.8	\$ 64.9	\$ 64.7	\$ 64.7
Interest	\$	0.1	\$ 0.1	\$ 0.1	\$	0.1	\$	0.1	\$ 0.1	\$ _	\$ 0.1
Withdraws (MRSM)	\$		\$ -	\$ **	\$	-	\$	-	\$ -	\$ _	\$ -
Ending Balance	\$	64.5	\$ 64.6	\$ 64.7	\$	64.8	\$	64.9	\$ 65.0	\$ 64.7	\$ 64.8

Case No. 2013-00199

Attachment to Response for AG 1-88(d)(ii)

Sponsoring Witness: Billie J. Richert

Page 1 of 4

Attachment to Response for AG 1-88(d)(ii) Reserve Fund Balances (In Millions)

Economic Reserve	:	orecast 2013 June	orecast 2013 July	orecast 2013 august	orecast 2013 eptember	orecast 2013 October	ecast 2013 evember	recast 2013 ecember	ecast 2014 anuary
Beginning Balance	\$	72.3	\$ 70.1	\$ 67.8	\$ 65.8	\$ 64.0	\$ 62.0	\$ 60.0	\$ 57.8
Interest	\$	_	\$ -	\$ -	\$ _	\$ 	\$ _	\$ -	\$
Withdraws (MRSM)	\$	(2.2)	\$ (2.3)	\$ (2.0)	\$ (1.8)	\$ (2.0)	\$ (2.0)	\$ (2.2)	\$ (3.4)
Ending Balance	\$	70.1	\$ 67.8	\$ 65.8	\$ 64.0	\$ 62.0	\$ 60.0	\$ 57.8	\$ 54.4
Rural Economic Reserve	_								
Beginning Balance	\$	64.8	\$ 64.9	\$ 65.0	\$ 65.1	\$ 65.2	\$ 65.3	\$ 65.4	\$ 65.6
Interest	\$	0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.2	\$ 0.1
Withdraws (MRSM)	\$	_	\$ 	\$ 	\$ _	\$ -	\$ -	\$ _	\$ -
Ending Balance	\$	64.9	\$ 65.0	\$ 65.1	\$ 65.2	\$ 65.3	\$ 65.4	\$ 65.6	\$ 65.7

Case No. 2013-00199

Attachment to Response for AG 1-88(d)(ii)

Sponsoring Witness: Billie J. Richert

Page 2 of 4

Attachment to Response for AG 1-88(d)(ii)

Reserve Fund Balances (In Millions)

Economic Reserve		ecast 2014 ebruary	recast 2014 March	recast 2014 <u>April</u>	Fo	recast 2014 <u>May</u>	F	Forecast 2014 June	F	orecast 2014 <u>July</u>		orecast 2014 August	orecast 2014 otember
Beginning Balance	\$	54.4	\$ 50.8	\$ 47.3	\$	44.1	\$	40.6	\$	36.6	\$	32.8	\$ 28.6
Interest	\$	-	\$ -	\$ _	\$	-	\$	_	\$	_	\$	_	\$
Withdraws (MRSM)	\$	(3.6)	\$ (3.5)	\$ (3.2)	\$	(3.5)	\$	(4.0)	\$	(3.8)	•	(4.2)	(3.8)
Ending Balance	\$	50.8	\$ 47.3	\$ 44.1	\$	40.6	\$	36.6	\$	32.8	\$	28.6	\$ 24.8
Rural Economic Reserve													
Beginning Balance	\$	65.7	\$ 65.8	\$ 65.9	\$	66.0	\$	66.1	\$	66.2	\$	66.3	\$ 66.4
Interest	\$	0.1	\$ 0.1	\$ 0.1	\$	0.1	\$	0.1	\$	0.1	\$	0.1	\$ 0.1
Withdraws (MRSM)	_\$	-	\$ -	\$ -	\$	-	\$	_	\$	_	\$	_	\$ _
Ending Balance	\$	65.8	\$ 65.9	\$ 66.0	\$	66.1	\$	66.2	\$	66.3	\$	66.4	\$ 66.5

Case No. 2013-00199

Attachment to Response for AG 1-88(d)(ii)

Sponsoring Witness: Billie J. Richert

Page 3 of 4

Attachment to Response for AG 1-88(d)(ii) Reserve Fund Balances (In Millions)

Economic Reserve		Forecast 2014 October		orecast 2014 ovember	_ 2	orecast 2014 cember	orecast 2015 anuary	Forecast 2016		
Beginning Balance	\$	24.8	\$	21.5	\$	18.1	\$ 14.2	\$	_	
Interest	\$	_	\$	_	\$	-	\$ _	\$	_	
Withdraws (MRSM)	\$	(3.3)	\$	(3.4)	\$	(3.9)	\$ (4.1)	\$	_	
Ending Balance	\$	21.5	\$	18.1	\$	14.2	\$ 10.1	\$	_	
Rural Economic Reserve	**									
Beginning Balance	\$	66.5	\$	66.6	\$	66.7	\$ 66.8	\$	43.6	
Interest	\$	0.1	\$	0.1	\$	0.1	\$ 0.1	\$	0.8	
Withdraws (MRSM)	\$	-	\$	_	\$	-	\$ -	\$	(36.4)	
Ending Balance	\$	66.6	\$	66.7	\$	66.8	\$ 66.9	\$	8.0	

Case No. 2013-00199

Attachment to Response for AG 1-88(d)(ii)

Sponsoring Witness: Billie J. Richert

Page 4 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 89) Provide all documents which contain analysis supporting any decision made
2	by Big Rivers to defer previously scheduled production plant maintenance outages
3	beginning in 2010 through 2016. Show and explain the amount and impact by account
4	number (or cost element) for actual FYs 2010 through 2012, actual 2013 YTD, base perio
5	(show actual and forecasted amounts separately) and the forecasted test period), and
6	forecasted 2016.
7	
8	Response) Please refer to the files as provided in Big Rivers' response to AG 1-85 in
9	Case No. 2012-00535 for outage deferrals/cancellations in years 2010-12. In 2013, the
10	Coleman Unit 1 outage was deferred from the spring of 2013 to the fall of 2013 due to the
11	uncertainty surrounding the Century Hawesville smelter and the potential temporary idling of
12	the Coleman plant. There have been no outage deferrals/cancellations in years 2014-2016.
13	
14	Witness) Robert W. Berry

Case No. 2013-00199 Response to AG 1-89 Witness: Robert W. Berry Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

- 1 Item 90) Please refer to the Berry Direct Testimony. Provide five year benchmarking
 2 study completed in April 2013 for period from January 2008 through December 2012.
 3 Provide any subsequent benchmarking study.
 4
- Response) Please see Big Rivers' response to KIUC 1-39.
- 7 Witness) Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 91)	Please provide all company staff assessments and risk evaluations regarding
2	the condition	n of each production facility and planned maintenance schedule and activities
3	from 2010 th	hrough 2016.
4		
5	Response)	Please see Big Rivers' response to KIUC 1-40.
6		
7	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 92)	Please provide historical and projected MISO costs used to develop Big
2	Rivers foreco	ast in electronic format compatible with Microsoft Office programs.
3		
1	Response)	Please see Big Rivers' response to AG 1-125.
5		
ŝ	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 93)	Please provide historical values associated with MISO FTR Market
2	settlements i	used to develop Big Rivers' forecast in electronic format compatible with
3	Microsoft O	ffice programs.
4		
5	Response)	Please see Big Rivers' response to AG 1-125.
6		
7	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1	Item 94)	Please provide historical values used to develop Big Rivers' forecast for
2	MISO non-a	dministrative and non-transmission related costs in electronic format
3	compatible v	vith Microsoft Office programs.
4		
5	Response)	Please see Big Rivers' response to AG 1-125.
õ		
7	Witness)	Robert W. Berry

7

Case No. 2013-00199 Response to AG 1-94 Witness: Robert W. Berry Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 95)	Please provide calculations and results used to determine "realized
2	revenues" fr	om the TVA transmission path in 2012 as well as the calculations and
3	assumptions	that were used to use this 2012 "realized revenue" to forecast projected
4	revenues. Pr	ovide information in electronic format compatible with Microsoft Office
5	programs.	
6		
7	Response)	Please see the attached spreadsheet which shows the realized revenues on the
8	TVA transmi	ssion in 2012. For budgeting purposes, Big Rivers assumed it would sell the
9	full capacity	of the TVA transmission reservation in 2014 for MWh. The resulting
10	revenues wer	e (100 MW times 8,760 hours times). These numbers have
11	been provided	d under petition for confidential treatment.
12		
13	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 95) Please provide calculations and results used to determine "realized	
2	revenues" from the TVA transmission path in 2012 as well as the calculations and	
3	assumptions that were used to use this 2012 "realized revenue" to forecast projected	
4	revenues. Provide information in electronic format compatible with Microsoft Office	
5	programs.	
6		
7	Response) Please see the attached spreadsheet which shows the realized revenues on the	
8	TVA transmission in 2012. For budgeting purposes, Big Rivers assumed it would sell the	
9	full capacity of the TVA transmission reservation in 2014 for MWh. The resulting	
10	revenues were (100 MW times 8,760 hours times). These numbers have	
11	been provided under petition for confidential treatment.	
12		
13	Witness) Robert W. Berry	

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 96)	Please refer to the Berry Direct Testimony at page 20, line 15-18: Provide
2	the generatin	g operating characteristics (capacity, heat rates, outage rates, ramp rates, fuel
3	contract information, demand and energy forecasts and other production cost model input)	
4	that Big Rivers supplied ACES to run the production cost model used in the application in	
5	electronic format compatible with Microsoft Office programs.	
6		
7	Response)	Please see Big Rivers' response to KIUC 1-12(b,d-g).
8		
۵	Witness)	Robert W Berry

Case No. 2013-00199 Response to AG 1-96 Witness: Robert W. Berry Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

- 1 Item 97) Please refer to the Berry Direct Testimony at page 20, line 22: Provide the
 2 ACES production model output used in the Big Rivers financial forecast used in the
 3 application in electronic format compatible with Microsoft Office programs.
 4
 5 Response) Please see the Confidential CD provided in response to PSC 1-57 and the file
 6 entitled "PCM Run".
- 8 Witness) Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 98)	Please refer to the Berry Direct Testimony at page 20, line 22: Provide all		
2	Big Rivers' p	Big Rivers' production cost models resulting from ACES PAR outputs provided to Big		
3	Rivers since January 1, 2012 in electronic format compatible with Microsoft Office			
4	programs.			
5				
6	Response)	Please see the attached CONFIDENTIAL electronic file(s) containing 57		
7	production co	st model runs exhibits (outputs) ACES has provided since January 1, 2012,		
8	provided under a petition for confidential treatment. PCM run file names are listed below in			
9	chronological order with most recent listed first. There were also an additional 32 models			
10	runs during this time period which are not provided in this response. Ten of the 32 runs were			
11	provided in C	provided in Case No. 2012-00535 and the remaining 22 were provided in Case No 2012-		
12	00063.	00063.		
13	"AG 1-98, PC	"AG 1-98, PCM Run, WilsonColeIdle, 10% higher (5-3-13).xlsx"		
14	"AG 1-98, PC	CM Run, WilsonColeIdle, 10% lower (5-3-13).xlsx"		
15	"AG 1-98, PC	CM Run,All Running,10% higher (5-3-13).xlsx"		
16	"AG 1-98, PC	CM Run,All Running,10% lower (5-3-13).xlsx"		
17	"AG 1-98, P	"AG 1-98, PCM Run, WilsonIdle (4-23-13).xlsx"		
18	"AG 1-98, PC	CM Run,ColemanIdle (4-23-13).xlsx"		

Case No. 2013-00199 Response to AG 1-98 Witness: Robert W. Berry Page 1 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- 1 "AG 1-98, PCM Run, ColeGreenIdle (4-23-13).xlsx"
- 2 "AG 1-98, PCM Run, WilsonGreenIdle (4-23-13).xlsx"
- 3 "AG 1-98, PCM Run, WilsonColeIdle-Back (4-22-13).xlsx"
- 4 "AG 1-98, PCM Run, WilsonColeIdle (4-15-13).xlsx"
- 5 "AG 1-98, PCM Run, All Running (4-15-13).xlsx"
- 6 "AG 1-98, PCM Run, WilsonColeIdle (4-8-13).xlsx"
- 7 "AG 1-98, PCM Run, WilsonIdle (4-8-13).xlsx"
- 8 "AG 1-98, PCM Run, Coleman Idle (4-8-13).xlsx"
- 9 "AG 1-98, PCM Run, Wilson Green Idle (4-8-13).xlsx"
- "AG 1-98, PCM Run, ColeGreenIdle (4-8-13).xlsx"
- 11 "AG 1-98, PCM Run, All Running (4-8-13).xlsx"
- "AG 1-98, PCM Run, Deterministic, WilsonIdle (2-25-13).xlsx"
- "AG 1-98, PCM Run, Stochastic, WilsonIdle (2-25-13).xlsx"
- 14 "AG 1-98, PCM Run, All Running (1-31-13).xlsx"
- 15 "AG 1-98, PCM Run, WilsonIdle (1-23-13).xlsx"
- 16 "AG 1-98, PCM Run, ColemanIdle (1-23-13).xlsx"
- 17 "AG 1-98, PCM Run, GreenIdle (1-23-13).xlsx"
- 18 "AG 1-98, PCM Run, HMPLIdle (1-23-13).xlsx"

Case No. 2013-00199 Response to AG 1-98 Witness: Robert W. Berry Page 2 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- 1 "AG 1-98, PCM Run, Deterministic, WilsonIdle (1-10-13).xlsx"
- 2 "AG 1-98, PCM Run, Stochastic, WilsonIdle (1-10-13).xlsx"
- Five 15 year PCM runs (11-27-12) and five 4 year PCM runs (10-17-12), provided in Case
- 4 No 2012-00535.
- 5 "AG 1-98, PCM Run, BaseCase (9-7-12).xlsx"
- 6 "AG 1-98, PCM Run, Sens.1 (9-7-12).xlsx"
- 7 "AG 1-98, PCM Run, Sens.2 (9-7-12).xlsx"
- 8 "AG 1-98, PCM Run, Sens. 3 (9-7-12).xlsx"
- 9 "AG 1-98, PCM Run, BaseCase, (9-5-12).xlsx"
- "AG 1-98, PCM Run, BaseCase, NoCentury (9-5-12).xlsx"
- 11 "AG 1-98, PCM Run, MustRun, (9-5-12).xlsx"
- "AG 1-98, PCM Run, MustRun, NoCentury (9-5-12).xlsx"
- 13 "AG 1-98, PCM Run, BaseCase rev. 1, (8-6-12).xlsx"
- "AG 1-98, PCM Run, MustRun rev. 1, (8-6-12).xlsx"
- 15 "AG 1-98, PCM Run, BaseCase, (8-1-12).xlsx"
- 16 "AG 1-98, PCM Run, MustRun, (8-1-12).xlsx"
- 17 "AG 1-98, PCM Run, MustRun rev. 2 (7-5-12).xlsx"
- 18 "AG 1-98, PCM Run, BaseCase v-limits rev.2 (7-5-12).xlsx"

Case No. 2013-00199 Response to AG 1-98 Witness: Robert W. Berry Page 3 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- 1 "AG 1-98, PCM Run, BaseCase v-limits rev.1 (7-3-12).xlsx"
- 2 "AG 1-98, PCM Run, MustRun rev.1 (7-3-12).xlsx"
- 3 "AG 1-98, PCM Run, BaseCase v-limits (6-8-12).xlsx"
- 4 "AG 1-98, PCM Run, BaseCase (6-6-12).xlsx"
- 5 "AG 1-98, PCM Run, MustRun (6-6-12).xlsx"
- 6 Twenty-two PCM Runs dated between 5-22-12 to 2-2-12 (all 15 year runs), provided in Case
- 7 No. 2012-00063
- 8 "AG 1-98, PCM Run, BaseCase (4-30-12).xlsx"
- 9 "AG 1-98, PCM Run, MustRun (4-30-12).xlsx"
- 10 "AG 1-98, PCM Run, Econ Sens (4-30-12).xlsx"
- 11 "AG 1-98, PCM Run, BaseSens (4-3-12).xlsx"
- 12 "AG 1-98, PCM Run, Econ Sens (4-3-12).xlsx"
- 13 "AG 1-98, PCM Run, BaseCase (3-28-12).xlsx"
- "AG 1-98, PCM Run, Sens 2 (3-12-12).xlsx"
- 15 "AG 1-98, PCM Run, Sens 1 (3-12-12).xlsx"
- 16 "AG 1-98, PCM Run, BaseCase (3-7-12).xlsx"
- 17 "AG 1-98, PCM Run, BaseCase (1-26-12).xlsx"
- 18 "AG 1-98, PCM Run, GreenIdle (1-26-12).xlsx"

Case No. 2013-00199 Response to AG 1-98 Witness: Robert W. Berry Page 4 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1 "AG 1-98, PCM Run, GreenIdleShldrs (1-26-12).xlsx"

2

3 Witness) Robert W. Berry

Case No. 2013-00199 Response to AG 1-98 Witness: Robert W. Berry Page 5 of 5

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 99)	Please refer to the Berry Direct Testimony at page 20, line 22: Provide		
2	copies of all	copies of all written and electronic correspondence between Big Rivers and ACES		
3	regarding PAR model outputs ACES has performed for Big Rivers since January 1, 201			
4				
5	Response)	Please see Big Rivers' response to KIUC 1-88.		
5				
7	Witness)	Robert W. Berry		

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information datedAugust 19, 2013

September 3, 2013

1 Item 100) Please provide a list of planned major outage activities for each unit for
2 each outage for 2013 through 2016.
3
4 Response) Please see Big Rivers' response to KIUC 1-40(c)
5
6 Witness) Robert W. Berry

BIG RIVERS ELECTRIC CORPORATION

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

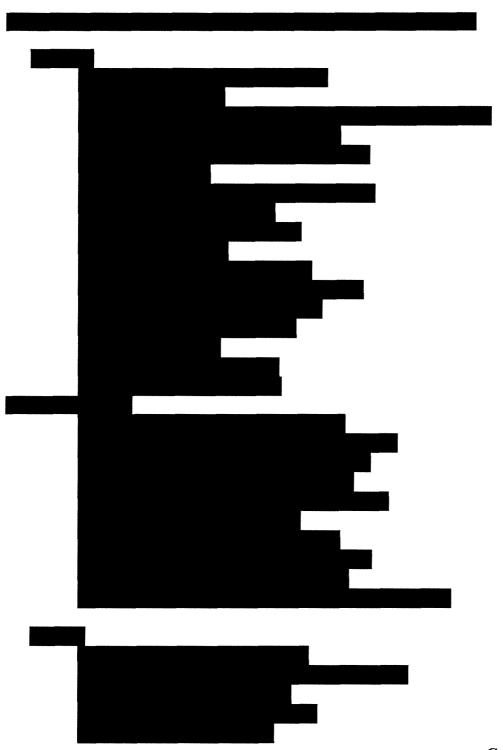
September 3, 2013

1	Item 101)	Please provide any changes to the 2013 through 2017 outage schedule from
2	implementati	ion of the Load Concentration Mitigation Plan. Detail should include all
3	major outage	e activities for each unit and each outage.
4		
5	Response)	Please see the CONFIDENTIAL attachments to this response for the outage
6	schedule char	nges and a list of the outage activities that were scheduled prior to
7	implementati	on of Big Rivers' Load Concentration Analysis and Mitigation Plan. The 2013
8	Coleman outa	age was reduced in scope to lower the cost due to the expected temporary idling
9	of the plant.	No scheduled outages will be performed on the units while they are in an idled
10	status; therefo	ore, the remaining Coleman and Wilson scheduled outages were cancelled
11	during the per	riod in which they are temporary idled.
12		
13	Witness)	Robert W. Berry

Attachment for Response to AG 1-101

Outage Changes Since Implementation of the Load Concentration Mitigation Plan

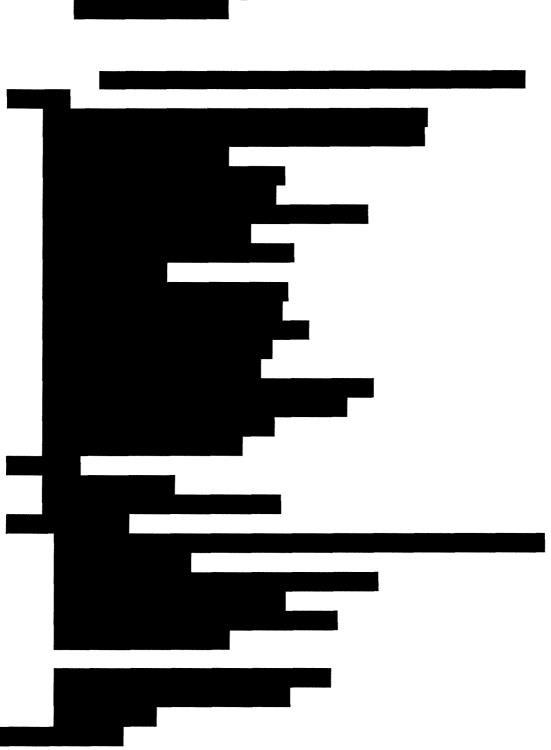
2013 Major Outage Objectives



Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 1 of 8

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-101

Outage Changes Since Implementation of the Load Concentration Mitigation Plan



Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 2 of 8

Attachment for Response to AG 1-101

Outage Changes Since Implementation of the Load Concentration Mitigation Plan





Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 3 of 8

Attachment for Response to AG 1-101 Outage Changes Since Implementation of the Load Concentration Mitigation Plan



Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 4 of 8

Attachment for Response to AG 1-101

Outage Changes Since Implementation of the Load Concentration Mitigation Plan



Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 5 of 8

Attachment for Response to AG 1-101



Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 6 of 8

Attachment for Response to AG 1-101

Outage Changes Since Implementation of the Load Concentration Mitigation Plan





Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 7 of 8

Attachment for Response to AG 1-101

Outage Changes Since Implementation of the Load Concentration Mitigation Plan



When the Load Concentration Analysis and Mitigation Plan was implemented in August of 2012, detailed plans for the 2017 outages had not yet been prepared. Detailed plans for the 2017 outages are currently being drafted for inclusion in Big Rivers' 2014 - 2017 Production Work Plan.

Case No. 2013-00199 Attachment for Response to AG 1-101 Witness: Robert W. Berry Page 8 of 8

Attachment for Response to AG 1-101 Outage Changes Since Implementation of the Load Concentration Mitigation Plan

	Unit	Net MW	2013	Change	2014	Change	2015	Change	2016	Change	2017	Change	Overall Change
Outage Schedule August 2012 Current Outage Schedule	Wilson Wilson	417											
Outage Schedule August 2012 Current Outage Schedule	Coleman 1 Coleman 1	150											
Outage Schedule August 2012 Current Outage Schedule	Coleman 2 Coleman 2	138											
Outage Schedule August 2012 Current Outage Schedule	Coleman 3 Coleman 3	155											
Outage Schedule August 2012 Current Outage Schedule Total Changes	Coleman FGD Coleman FGD												

BIG RIVERS ELECTRIC CORPORATION

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information datedAugust 19, 2013

September 3, 2013

1	Item 102)	Please refer to Exhibit Berry 2: Provide detail of each item in capital
2	construction	budget 2014-2016 by unit and year. Include description of implementation
3	and if and wh	y an outage or derate is required for implementation (as well as expected
4	duration of o	utage or derate), reason for performance of activity (environmental
5	requirement,	recommended maintenance, industry issue, etc.), and whether activity is
6	scheduled bas	sed on expected run hours, age, commitment or expected inspection results o
7	other basis fo	r schedule.
8		
9	Response)	Please see the CONFIDENTIAL attachment to this response, which is
10	provided purs	uant to a petition for confidential treatment, for the details requested of the
11	capital constru	action budget for 2014 - 2016.
12		
13	Witness)	Robert W. Berry

Case No. 2013-00199 Response to AG 1-102 Witness: Robert W. Berry Page 1 of 1

CONFIDENTIAL ATTACHMENT(S) PRODUCED SEPARATELY

BIG RIVERS ELECTRIC CORPORATION

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 103) Please refer to Exhibit Berry 2: Provide all details of any changes to each
2	item in capital construction budget 2014-2016 by unit and year caused by implementation
3	of Load Concentration Mitigation Plan. Information should include details previously
4	provided including changes to implementation (as well as expected duration of outage or
5	derate), changes to reason for performance of activity (environmental requirement,
6	recommended maintenance, industry issue, etc.), and changes to whether activity is
7	scheduled based on expected run hours, age, commitment or expected inspection results of
8	other basis for schedule.
9	
10	Response) Big Rivers objects that this request is overly broad and unduly burdensome
11	insofar as it seeks "details previously provided." Notwithstanding these objections, and
12	without waiving them, please see Big Rivers esponse to KIUC 1-42(a).
13	
14	Witness) Robert W. Berry

BIG RIVERS ELECTRIC CORPORATION

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 104)	Provide Wilson and Coleman Lay-Up plans as well as all scheduled
2	activities to o	ccur during Wilson and Coleman Lay-Up as well as details regarding Wilson
3	Lay-Up plan	security, operating, maintenance and administration staff necessary to
4	implement th	e plan.
5		
6	Response)	Please see the attachments to this response for copies of the Wilson and
7	Coleman layu	p plan overviews.
8		

Robert W. Berry

9

Witness)



Attachment for Response to AG 1-104

BIG RIVERS ELECTRIC CORPORATION

PLANT LAY-UP OVERVIEW

COLEMAN STATION

Lay-up Committee 8/23/2013

River Area

Circulating water pumps Maintain and operate pumps monthly Operate intake crane monthly Clean, flush, drain Secure gantry crane to prevent movement during storms

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 1 of 16



Lay-up Preparation

	 Protect cables and sheaves with corrosion inhibitors Protect gearbox oil with dispersion / stabilization chemicals
Circulating water intake screen	
 Maintain and operate intake screens monthly 	Clean, flush and drain screens and screen wash pumps
 Maintain and operate screen wash pumps monthly 	Close cell gates to each circulating water pump
Circulating water piping	
 Maintain piping drained but ready for service 	Clean, flush, drain and winterize
Intake electrical motor control center	
 Maintain and operate switchgear heaters 	Protect electrical cabinets with corrosion inhibitors
 Maintain access doors closed to eliminate bird entry 	
Tug boat	
	Relocate to other station or dry dock
Barge unloader	
 Maintain access doors closed to eliminate bird entry 	Clean, flush, drain and winterize barge unloader
Operate equipment monthly	Place clamshell bucket on grate and thoroughly lubricate
	Protect cables and sheaves with corrosion inhibitors
	Protect gearbox oil with dispersion / stabilization chemicals
	Prevent bird entry by closing all access openings
Barge unloaderelectrical and engine room	
 Maintain and operate switchgear heaters 	Protect electrical cabinets with corrosion inhibitors
 Maintain access doors closed to eliminate bird entry 	Prevent bird entry by closing all access openings
,	Protect cables and sheaves with corrosion inhibitors
	Protect gearbox oil with dispersion / stabilization chemicals

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 2 of 16

Fueland Material Handling

Conveyor #1	
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Conveyor #2	
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Conveyor #3	de la constant de la
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Conveyor #4	
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals

Placing the station in an extended lay-up condition will require effective corrosion control to ensure maximum value retention of the assets. If the station is idled without proper preservation measures in place there will be considerable equipment deterioration. The degradation could be severe enough to warrant major repairs and/or restoration efforts when the plant is restored to service. Based on decades of research, the Electric Power Research Institute (EPRI) has published guidelines for best practices when laying-up a fossil fuel plant. These guidelines were used as the basis for this document. This document outlines a comprehensive plan to provide the greatest long term protection to the maximum amount of equipment, yet maintain the ability to restart the plant with minimal effort. From this document will be derived specific procedures for cleaning, preparing, preserving and maintaining the station as well as procedures for a future return to service. Routine maintenance considerations have been outlined in the column titled in-service. Activities associated with equipment lay-up are listed as lay-up preparation. Activities associated with equipment lay-up pertains to all Coleman Station generating units, FGD, and auxiliary equipment

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 3 of 16

Lay-up Preparation

Conveyor #5	
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Conveyor #6	Treces Bear obx on With dispersion / Stabilization chemicals
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Conveyor #11 and 12	
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Bunker Conveyors #7,8,9,10,13,and 14	general and a second of the international and a second of the internationa
 Maintain and operate conveyor with drive motor monthly 	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Segregating Gates	1 Total gearoox on with dispersion / Stabilization themicals
Operate gates monthly	 Power wash and neutralize with 5% soda ash solution Protect gearbox oil with dispersion / stabilization chemicals
Fuel Blending Conveyors15-18	Tratact Bear box on With dispersion / Stabilization chemicals
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Limestone, Gypsum, Radial Stacker, Vacuum Filter Belts and Truck Unloading Conveyor	Clean, flush, drain and winterize equipment
Maintain and operate conveyor with drive motor monthly	 Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals Secure Radial Stacker in place
Crusher house	
 Maintain bird deterrents Rotate crusher 1 ¼ turn by hand monthly 	 Clean, flush, drain and winterize all equipment Protect hoppers with corrosion inhibitors Prevent bird entry by closing all access openings

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 4 of 16

Lay-up Preparation

	 Protect idler bearings by thoroughly lubricating Protect gearbox oil with dispersion / stabilization chemicals
Crusher house electrical and fuel blending deluge building	g state of the sta
 Maintain and operate switchgear heaters Maintain and operate building heat Maintain and operate deluge building heat Maintain access doors closed to eliminate bird entry Maintain ABB DCS control cabinets 	Protect electrical cabinets with corrosion inhibitors
Coal Reclaim, Limestone Reclaim, Truck Unloading Reclaim, & Egress	
Tunnels	
 Maintain and operate sumps and vents continuously, verify weekly 	

Water Plant Area

Site drainage	
 Maintain and operate sump pumps as needed, verify weekly 	
Maintain and operate associated heat trace	
 Isolate pumps and seal water unless needed 	
 Continue to perform required environmental sampling (KPDES) 	
Make-up clarifiers and water treatment pumps	
 Rotate rake 1 ¼ turn with drive motor monthly 	Clean, flush, drain and winterize clarifier and piping
 Rotate clarified water and backwash pumps 1 ¼ turn by hand monthly 	 Protect tank from sunlight and birds with mesh screen cover Protect pumps in place with corrosion inhibitors
Water plant building	
 Maintain and operate building heat and fire protection 	Clean, flush, drain and winterize all equipment and piping
Maintain access doors closed to eliminate bird entry	Remove all media from vessels and dispose of properly, including
 Rotate pumps 1 ¼ turn by hand monthly 	RO membrane
Bulk Acid & Caustic tanks	
Maintain, inspect, and drain as needed	Drain and neutralize tank contents
 Rotate pumps 1 ¼ turn by hand monthly 	Clean, flush, drain, and winterize pumps and piping
Raw water pumps	Seasy mash, and whitenze puttips and piping

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 5 of 16

Lay-up Preparation

 Rotate pumps 1 ¼ turn by hand monthly 	Clean, flush, drain and winterize all circulating water pumps
Raw water pump piping	clearly mash, aram and whiterize an circulating water pullips
	Clean, flush, drain and winterize
	 Protect pipe by increasing normal chemical concentrations
Well water pumps	7 3
 Maintain and operate all pumps as needed, alternate monthly 	Open crosstie valve to provide firewater
 Ensure heat trace and insulation are in good condition 	open crossile valve to provide mewater

Turbine Generator

Transformer area sump pumps	
 Maintain and operate pumps as needed, verify weekly 	
Air compressor Rotate air compressors 1 ½ turn by hand weekly Maintain and operate lube oil system weekly Maintain and operate new compressor continuously	 Install an air cooled air compressor capable of 200 CFM Protect compressors in place with corrosion inhibitors Protect lube oil with dispersion / stabilization chemicals
Air dryer system	
Vacuum pumps	
Rotate vacuum pumps 1 ¼ turns by hand monthly	 Clean, flush, drain and winterize pumps and piping Protect pumps in place with corrosion inhibitors Protect coolers with corrosion inhibitor capsules
Feedwater HP heaters - 5,6	- Crocect edoicio with corrosion initibilor capsules
	 Open all vents and drains to boil water from vessel Protect with dehumidification before dew point is reached
Station and FGD batteries	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 6 of 16

Lay-up Preparation

 Maintain and inspect per current procedure 	
Laboratory area	
	 Remove and dispose of all laboratory chemicals Clean, flush, drain and winterize boiler water sample panel Protect equipment in place with corrosion inhibitors Protect electrical cabinets with corrosion inhibitors
Chemical Make-up Area C1, C2, C3, & sumps	The state of the s
 Maintain and operate as needed, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed Rotate chemical injection pumps 1 ½ turns by hand monthly 	 Protect pumps in place with corrosion inhibitors Clean and remove any contaminants including hydrazine and ammonia Clean, flush, drain, and winterize chemical injection pump
 Lube oil system includes storage tanks Maintain and operate lube oil system weekly Maintain and operate filtration system Maintain and operate clean and dirty storage tanks May require heat or continuous operating if temp < 70°F Test and analyze oil per established procedure 	 Protect lube oil with dispersion / stabilization chemicals Install new tank heaters at each lube oil tanks
Hotwell	
	Protect with dehumidification before dew point is reached
Condenser and waterbox	Protect with dehumidification before dew point is reached
Closed cooling water system	1 Total With achidimanication before dew point is reached
Rotate pumps 1 ¼ turn by hand monthly	 Clean, flush, drain and winterize pumps and piping Protect pumps in place with corrosion inhibitors
Feedwater LP heater 1,2,3	Open all vents and drains to boil water from vessel Protect with dehumidification before dew point is reached
Relay room and cable pull room	- Frotect with dendmidification before dew point is reached
 Maintain and operate fire protection system Maintain and operate HVAC systems Maintain ABB DCS control cabinets 	
EH system	
Maintain and operate EH system weekly	 Protect EH fluid with dispersion / stabilization chemicals

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 7 of 16

Lay-up Preparation

 May require heat or continuous operating if temp < 70°F Test and analyze oil per established procedure Main turbine Rotate turbine for 1 hour on turning gear weekly Position rotor 90° from start position each time 	 Open all vents and drains @ 400°F to boil water from vessel Protect with dehumidification before dew point is reached Install mechanical blocking devices to hold valves open
Generator/Exciter	
Rotate generator for 1 hour on turning gear weekly	 Protect with dehumidification before dew point is reached Protect H₂ coolers, water side, with corrosion inhibitors Protect exciter coolers, water side, with corrosion inhibitors Purge and remove hydrogen from site
Seal Oil system	
 Maintain and operate seal oil system weekly May require heat or continuous operating if temp < 70°F Test and analyze oil per established procedure 	Protect seal oil fluid with dispersion / stabilization chemicals
4160V Switchgear/480V bus/Motor Control Centers	
 Maintain integrity of switchgear heaters 	Protect electrical cabinets with corrosion inhibitors
Control room	
 Maintain and operate HVAC systems 	

Boiler Building

PA Fan ■ Rotate fan 1 ¼ turn by hand weekly ■ May require heat or continuous operating if temp < 70°F	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
FD Fan	
 Rotate fan 1 ¼ turn by hand weekly Stroke fan inlet vanesmonthly May require heat or continuous operating if temp < 70°F 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
Sump pumps	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 8 of 16

Lay-up Preparation

Maintain and operate as needed, verify weekly	
 Wetbottom and Bottom Ash Removal System Maintain seal on wetbottom Rotate ash sluice pumps 1 ¼ turn by hand monthly Rotate slag grinder 1 ¼ turn by hand monthly 	 Clean, flush, drain and winterize equipment and piping Protect equipment with corrosion inhibitors Clean, flush, drain and winterize pyrite holding bin and equipment Protect pyrite holding bin with corrosion inhibitors Deslag unit when offline Protect lube oil with dispersion / stabilization chemicals
Pulverizers	
 Maintain proper level for lube oil system weekly Operatepulverizers monthly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
Ball Mill	Trocect tabe on with dispersion y stabilization theiriteas
 Rotate ballmill 1 ¼ turn with drive motor weekly Maintain and operate mill lift pump and lube oil pumps weekly 	 Remove, sort and drum ball charge or sell to supplier Clean, flush, drain and winterize ball mills Protect lubricant with dispersion / stabilization chemicals
Plant and FGD Diesel generator	Frotect lubricant with dispersion / stabilization chemicals
Maintain and operate per current OPL	 Protect diesel fuel by adding stabilizer to storage tank
Air Preheater	
 Maintain proper level for lube oil system weekly Rotate air heater 1 ¼ turn with air drive weekly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
Burners / Windbox	1 Total Tube on With dispersion) Stabilization Chemicals
 Move burner hoods by hand monthly Rotate Burner Seal Air fans 1 ¼ turn by hand monthly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
Coal bunkers	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Radiation Sources	
 Radiation officers to remove all radiation sources and relocate to 	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 9 of 16

Lay-up Preparation

Wilson Station	
Sootblowers	
Rotate sootblower gearbox monthly	 Clean and remove fuel residue from all surfaces Protect steam piping Protect lube oil with dispersion / stabilization chemicals Protect electrical cabinets with corrosion inhibitors
Waterwalls, superheat, reheat and economizer, fire side	
Maintain effective sealing to minimize moisture infiltration	 Deslag on-line to thoroughly remove slag Install airtight seal at knees Protect with dehumidification before dew point is reached
Waterwalls, superheat, reheat and economizer, water side	
Maintain effective sealing to minimize moisture infiltration	 Open all vents and drains @ 400°F to boil water from tubes Protect with dehumidification before dew point is reached
Deaerator storage tank, #4 heater	
 Maintain effective sealing to minimize moisture infiltration 	 Open all vents and drains to boil water from vessel Protect with dehumidification before dew point is reached
Drums	The state of the s
Maintain effective sealing to minimize moisture infiltration	 Open all vents and drains @ 400°F to boil water from vessel Protect with dehumidification before dew point is reached
Penthouses	
Maintain effective sealing to minimize moisture infiltration	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Dead air spaces	
Maintain effective sealing to minimize moisture infiltration	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Boiler Building	
 Maintain and operate fire protection system above freezing Flush, drain and winterize external boiler firewater headers and piping 	 Construct enclosure to protect fire water headers Clean by dry vacuum all fuel residue from the boiler building
Deludge System	
 Maintain, operate, and test per work package 	
Station service, instrument, and FGD air compressor	
 Rotate air compressors 1 ¼ turn by hand weekly 	Protect compressors in place with corrosion inhibitors

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 10 of 16

Lay-up Preparation

Maintain and operate lube oil system weekly	Protect lube oil with dispersion / stabilization chemicals
Ash Recirculation system and pumps	
Rotate pumps 1 ¼ turn by hand monthly	 Clean, flush, drain and winterize pumps and piping Protect pumps in place with corrosion inhibitors
Propane tanks, vaporizers, and pumps	
 Maintain, test and operate as needed 	
Natural Gas System	
	Blank Natural Gas at isolation valve at each unit

Electrostatic Precipitator

Precipitator Box and ductwork	Protect with dehumidification before dew point is reached
Plates, wires and rappers	Internally wash ESP and neutralize with 5% soda ash solution
Maintain effective sealing to minimize moisture infiltration	 Protect with dehumidification before dew point is reached Internally wash ESP and neutralize with 5% soda ash solution Protect rappers with corrosion inhibitors
Flyash transport system	
	Clean, flush, drain and winterize Flyash system piping

FGD - Flue Gas Desulfurization

Booster Fans	
Maintain and operate lube oil system weekly	Protect with dehumidification before dew point is reached
Rotate fan 1 ¼ turn by hand weekly	Protect lube oil with dispersion / stabilization chemicals

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 11 of 16

Lay-up Preparation

 May require heat or continuous operating if temp < 70°F Maintain effective sealing to minimize moisture infiltration 	Clean by dry vacuum after dry air equipment is in service
Inlet ducts	
 Close and seal inlet guillotine dampers Maintain effective sealing to minimize moisture infiltration 	 Protect with dehumidification before dew point is reached High pressure wash and rinse until discharge water is > 6pH Passivate all internal surfaces with a 5% solution of soda ash Dry out with heaters and seal access openings Protect seal air blowers in place with corrosion inhibitors
Absorber Module	
 Maintain access doors closed to eliminate bird entry Close and seal inlet guillotine dampers Maintain effective sealing to minimize moisture infiltration 	 Clean, flush, drain and winterize modules and piping Lower doors open/covered by screens, access to agitators Close all other access openings Protect with dehumidification before dew point is reached High pressure wash and rinse until discharge water is > 6pH Passivate all internal surfaces with a 5% solution of soda ash Dry out with heaters and seal access openings
Outlet duct	
Maintain access doors closed to eliminate bird entry	 Clean, flush, drain and winterize outlet duct and drain piping Drains to remain open to allow moisture to escape Close all other access openings Protect seal air blowers in place with corrosion inhibitors
FGD Stack	The state of the s
 Rotate pressurization fans 1 ¼ turn by hand monthly Stroke louver damper by hand monthly Maintain access doors closed to eliminate bird entry 	 Clean, flush, drain and winterize stack liner and drain piping Protect pressurization fans in place with corrosion inhibitors Protect louver dampers in place with corrosion inhibitors
By-pass Stacks	
 Stroke louver damper by hand monthly 	 Protect louver dampers in place with corrosion inhibitors
Recycle Pumps	
Rotate pumps 1 ½ turns by hand monthly	 Clean, flush, drain, and winterize pumps and piping Protect lubricant with dispersion / stabilization chemicals
Agitators (Absorber module and storage tanks)	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 12 of 16









Rotate agitator impeller 1 ¼ turn by hand monthly	Clean, flush, drain and winterize agitators
	 Protect lubricant with dispersion / stabilization chemicals
	 Release belt tension and apply corrosion inhibitors to drives
	Protect gearbox oil with dispersion / stabilization chemicals
Oxidation Air Blowers	
 Maintain proper level for lube oil system weekly 	Protect with dehumidification before dew point is reached
 Rotate gearbox 1 ¼ turn by hand monthly 	 Protect lube oil with dispersion / stabilization chemicals
Primary Hydroclone pumps & sumps	
 Rotate pumps 1 ¼ turn by hand monthly 	Clean, flush, drain and winterize pumps
 Maintain sump level with a portable sump pump 	 Clean all slurry accumulations from all trenches and sumps
	 Protect bearing cartridges by thoroughly lubricating
	 Release belt tension and apply corrosion inhibitors to drives
GDE Building	
 Rotate pumps 1 ¼ turn by hand monthly 	 Clean, flush, drain and winterize underflow pumps and piping
 Maintain and operate sump pumps as needed, verify weekly 	 Protect gearbox oil with dispersion / stabilization chemicals
 Maintain and operate seal water and associated heat trace 	 Prevent bird entry by closing all access openings
 Isolate sump pump and seal water unless needed 	Clean slurry from all surfaces
 Maintain and operate floor sumps as needed, verify weekly 	 Floor drains and sumps be left empty
 Maintain and operate seal water and associated heat trace 	Clean, flush, drain and winterize building
 Isolate sump pump and seal water unless needed 	 Prevent bird entry by closing all access openings
Maintain access doors closed to eliminate bird entry	
GDE building electrical rooms	
Maintain and operate switchgear heaters	Protect electrical cabinets with corrosion inhibitors
Maintain and operate HVAC systems	
Maintain ABB DCS control cabinets	

Limestone mill area

Limestone mills	
Rotate ballmill 1 ¼ turn with drive motor weekly	Remove, sort and drum ball charge or sell to supplier
Maintain and operate lift pumps and lube oil pumps weekly	Clean, flush, drain and winterize ball mills
	Protect lubricant with dispersion / stabilization chemicals

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 13 of 16

Lay-up Preparation

Product sump and pumps	
Rotate sump pumps 1 ¼ turn by hand monthly	 Clean, flush, drain and winterize sumps and pumps Protect bearing cartridges by thoroughly lubricating Release belt tension and apply corrosion inhibitors to drives
Limestone silo	and apply corresion inhibitors to drives
Maintain access doors closed to eliminate bird entry	 Clean all limestone from silo interior Clean all limestone from the equipment level and ground floor Protect conveyor idler bearings by thoroughly lubricating Prevent bird entry by closing all access openings
Limestone prep building	and an added openings
 Rotate pumps 1 ¼ turn by hand monthly Maintain access doors closed to eliminate bird entry 	 Clean, flush, drain and winterize sumps and pumps Protect electrical cabinets with corrosion inhibitors Prevent bird entry by closing all access openings

Dewatering

Vacuum filters	
 Rotate belts 1 ¼ turn with drive motor monthly 	Clean, flush, drain and winterize drums and piping
 Rotate agitator with drive motor monthly 	Vats shall be left empty
	Protect lube oil with dispersion / stabilization chemicals
	Remove and dispose of filter cloth and attachment rope
Vacuum pumps	
Rotate vacuum pumps 1 ¼ turns by hand monthly	Clean, flush, drain and winterize pumps and piping
	Protect pumps in place with corrosion inhibitors
	 Protect coolers with corrosion inhibitor capsules
Surge tanks and filter feed pumps	
Rotate pumps 1 ¼ turn by hand monthly	Clean, flush, drain and winterize pumps and piping
	Tanks shall be left empty
	Protect bearing cartridges by thoroughly lubricating
	Release belt tension and apply corrosion inhibitors to drives
Filtrate return pumps	SPP/ STIESTED TO CHINCE
 Rotate pumps 1 ¼ turn by hand monthly 	Clean all slurry residue from all surfaces

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 14 of 16

Lay-up Preparation

Secondary tank, wastewater, & associated sump pumps Maintain and operate as needed to control level, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed	 Sump shall be left empty Release belt tension and apply corrosion inhibitors to drives Clean all FGD residue from sump and surrounding area
Maintain and operate conveyor monthly	 Clean slurry from all surfaces Protect idler bearings by thoroughly lubricating Place stackout conveyor in the lowest possible position Secure stackout conveyor to prevent movement during storms

Buildings and Grounds

Site Security & Communication	
 Maintain Gai-tronics for emergency alarms Maintain radios/repeaters for personnel communication Maintain and operate underground fire protection system Maintain and operate all plant lighting for safety and security Maintain and operate stack strobe lights Maintain and operate all entrance gates for security Maintain and operate all security cameras 	 Security patrols to be performed by operational personnel Winterize above ground fire protection system or lay-up dry
Buildings and Facilities	
 Maintain and inspect cathodic protection including water tower, 3 year inspection 	
Maintain and inspect fire extinguishers	
Maintain and inspect eye wash stations	
 Maintain and inspect outlying restroom facilities 	
Maintain and inspect elevators, annual certification required	
Maintain and operate all outlying HVAC systems	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 15 of 16

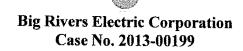
Lay-up Preparation

Maintain and operate all building sprinkler systems	
Maintain current mowing and weed control	
 Conduct dam inspections of all three ponds on a monthly basis 	
 Conduct SPCC, BMP, GPP inspections on a monthly basis 	
Sewage Collection System	
 Maintain and operate sewage lift stations, verify weekly 	
Overhead Cranes and Hoists	
Secure when not in use	Protect cables and sheaves with corrosion inhibitors
Operate overhead cranes monthly	Protect gearbox oil with dispersion / stabilization chemicals
Plant Vehicles	
Maintain water truck to transport water	Heavy equipment transferred to other stations
	Majority of plant vehicles transferred to other stations

Staffing

Layup Staffing	
1 Supervisor	
9 Control Room Operators	
1 Auxiliary Operators	
1 Laboratory Operator	
• 1 Mechanic	
• 1 Electrician	
1 Instrument Technician	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry Page 16 of 16



Attachment for Response to AG 1-104

PLANT LAY-UP OVERVIEW

WILSON STATION

Lay-up Committee 12/12/2012

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 1 of 21

Lay-up Preparation

River Area

River water pumps	
 Maintain and operate pumps in recirculation mode monthly 	Clean, flush, drain
	Secure gantry crane to prevent movement during storms
River water intake screen	
 Maintain and operate intake screens monthly 	Clean, flush and drain screens and screen wash pumps
Maintain and operate screen wash pumps monthly	beauty wastrand and street said street wastr paintps
River water piping	
 Maintain piping drained but ready for service 	Clean, flush, drain and winterize
,	Protect pipe by increasing normal chemical concentrations
River water intake electrical building	- Frocest pipe by increasing normal chemical concentrations
 Maintain and operate switchgear heaters 	Protect electrical cabinets with corrosion inhibitors
 Maintain access doors closed to eliminate bird entry 	1 10 total cication capitals with corrosion illimited 5
Chlorine feed system	
 Maintain chlorine system in case river water piping is used 	
Utilize smaller chlorine storage cylinder	
Maintain access doors closed to eliminate bird entry	
Tug boat	
-	Relocate to Green Station
	- Inclocate to dicell Station

Placing the station in an extended lay-up condition will require effective corrosion control to ensure maximum value retention of the assets. If the station is idled without proper preservation measures in place there will be considerable equipment deterioration. The degradation could be severe enough to warrant major repairs and/or restoration efforts when the plant is restored to service. Based on decades of research, the Electric Power Research Institute (EPRI) has published guidelines for best practices when laying-up a fossil fuel plant. These guidelines were used as the basis for this document. This document outlines a comprehensive plan to provide the greatest long term protection to the maximum amount of equipment, yet maintain the ability to restart the plant with minimal effort. From this document will be derived specific procedures for cleaning, preparing, preserving and maintaining the station as well as procedures for a future return to service. Routine maintenance considerations have been outlined in the column titled in-service. Activities associated with equipment lay-up are listed as lay-up preparation.

Lay-up Preparation

Barge unloader	
 Maintain access doors closed to eliminate bird entry Maintain locked gate barricades to prevent unauthorized entry Maintain and operate river water pump 	 Clean, flush, drain and winterize barge unloader Place clamshell bucket on grate and thoroughly lubricate Protect cables and sheaves with corrosion inhibitors Protect gearbox oil with dispersion / stabilization chemicals
	 Protect gearbox oil with dispersion / stabilization chemicals Prevent bird entry by closing all access openings Install locking gate type barriers to prevent unauthorized entry
Barge unloader electrical building	
 Maintain and operate switchgear heaters Maintain and test batteries per current OPL Maintain access doors closed to eliminate bird entry 	 Protect electrical cabinets with corrosion inhibitors Prevent bird entry by closing all access openings

Fuel Handling

Conveyor 10-1	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 10-2	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
 Maintain runoff pond as needed, verify weekly 	Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 7-1	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
 Maintain runoff pond as needed, verify weekly 	Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 7-2	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
Maintain runoff pond as needed, verify weekly	Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 7-3	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 3 of 21

Lay-up Preparation

	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 7-4	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
	Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 9	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
	 Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 11A & 11B	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
	 Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 8-1	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
	 Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 8-2	
 Maintain and operate conveyor with drive motor monthly 	 Clean, flush, drain and winterize equipment
	 Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Car dumper	
 Maintain and operate sump pump as needed, verify weekly 	Clean, flush, drain and winterize equipment
 Maintain and operate seal water and associated heat trace 	 Protect hoppers with corrosion inhibitors
 Isolate sump pump and seal water unless needed 	 Prevent bird entry by closing all access openings, build a
 Maintain access doors closed to eliminate bird entry 	temporary metal wall to close openings
	 Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Car dumper electrical building	
Maintain and operate switchgear heaters	 Protect electrical cabinets with corrosion inhibitors
Maintain access doors closed to eliminate bird entry	 Prevent bird entry by closing all access openings
Conveyor 1	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 4 of 21

Lay-up Preparation

 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
	Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Sample tower	
 Maintain and test batteries per current procedure 	Clean, flush, drain and winterize equipment
 Maintain access doors closed to eliminate bird entry 	Protect hoppers with corrosion inhibitors
	 Prevent bird entry by closing all access openings
	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals
Sample tower electrical building	
 Maintain and operate switchgear heaters 	Protect electrical cabinets with corrosion inhibitors
 Maintain access doors closed to eliminate bird entry 	Prevent bird entry by closing all access openings
Conveyor 2	, , , see see see see see see see see se
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
·	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals
Stacker / Reclaimer	g g g g g g g g g g g g g g g g g g g
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
 Maintain and test batteries per current procedure 	Protect buckets and hoppers with corrosion inhibitors
Maintain bird deterrents	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals
	Prevent bird entry by closing all access openings
	Protect electrical cabinets with corrosion inhibitors
	Secure boom at the south end of track on anchor point
Conveyor 3	The state of the s
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
·	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals
Conveyor 3A	
 Maintain and operate conveyor with drive motor monthly 	Clean, flush, drain and winterize equipment
 Maintain and operate sump pump as needed, verify weekly 	 Protect idler bearings by thoroughly lubricating
 Maintain and operate seal water and associated heat trace 	Protect gearbox oil with dispersion / stabilization chemicals
 Isolate sump pump and seal water unless needed 	See Established See Establishe

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 5 of 21

Lay-up Preparation

Conveyor 4	
Maintain and operate conveyor with drive motor monthly Maintain and operate sump pump as peopled, verify weekly.	Clean, flush, drain and winterize equipment
wantan and operate samp pamp as needed, verify weekly	 Protect idler bearings by thoroughly lubricating
Walltain and operate seal water and associated field trace	 Protect gearbox oil with dispersion / stabilization chemicals
Isolate sump pump and seal water unless needed Crusher tower	
Maintain bird deterrents	
• Maintain bird deterrents	Clean, flush, drain and winterize all equipment
	Protect hoppers with corrosion inhibitors
	 Prevent bird entry by closing all access openings
	 Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Crusher tower electrical and deluge buildings	
 Maintain and operate switchgear heaters 	 Protect electrical cabinets with corrosion inhibitors
 Maintain and operate building heat 	
 Maintain and operate deluge building heat 	
 Maintain access doors closed to eliminate bird entry 	
Conveyor 5A & 5B	
 Maintain and operate conveyors with drive motor monthly 	Clean, flush, drain and winterize equipment
 Maintain and operate fire protection system 	 Protect idler bearings by thoroughly lubricating
	 Protect gearbox oil with dispersion / stabilization chemicals
Tripper tower	
Maintain bird deterrents	Clean, flush, drain and winterize all equipment
	Protect hoppers with corrosion inhibitors
	Prevent bird entry by closing all access openings
	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals
Tripper tower electrical building	
 Maintain and operate switchgear heaters 	Protect electrical cabinets with corrosion inhibitors
 Maintain access doors closed to eliminate bird entry 	
Conveyor 6A & 6B	
 Maintain and operate conveyors with drive motor monthly 	Clean, flush, drain and winterize equipment
·	Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 6 of 21

Lay-up Preparation

Conveyor 12	
Maintain and operate conveyor with drive motor monthly	 Clean, flush, drain and winterize equipment Protect idler bearings by thoroughly lubricating
	Protect gearbox oil with dispersion / stabilization chemicals

Water Plant Area

Site drainage (KPDES 003)	
 Maintain and operate pumps as needed, verify weekly 	
 Maintain and operate seal water and associated heat trace 	
 Isolate pumps and seal water unless needed 	
 Continue to perform required environmental sampling 	
Waste impoundment pond	
 Maintain and operate pumps as needed, verify weekly 	Modify pump discharge to fill waste water pond
 Maintain and operate seal water and associated heat trace 	The same and state to the water portu
 Isolate sump pump and seal water unless needed 	
Waste water pond	
 Maintain and operate pumps as needed, verify weekly 	Modify pump discharge to fill cooling tower basin
 Maintain and operate seal water and associated heat trace 	, i and a second second
 Isolate sump pump and seal water unless needed 	
Concrete pond	
 Maintain and operate pumps as needed, verify weekly 	Pump to waste impoundment pond
Make-up clarifiers and blowdown pumps	
 Rotate rake 1 ¼ turn with drive motor monthly 	Clean, flush, drain and winterize clarifier and piping
 Rotate blowdown pumps 1 ¼ turn by hand monthly 	Protect tank from sunlight and birds with mesh screen cover
	Protect pumps in place with corrosion inhibitors
Water plant building	
 Maintain and operate building heat and fire protection 	Clean, flush, drain and winterize all equipment and piping
 Maintain access doors closed to eliminate bird entry 	Remove all media from vessels and dispose of properly
Cooling tower	The state of the s
 Maintain basin between half and three fourths full 	Refill basin from waste water ponds or truck from river
 Maintain biological control of water as needed 	Protect tower from sunlight and birds with mesh screen cover

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 7 of 21

Lay-up Preparation

	Clean, flush, drain and winterize all chemical feed systems
Carlling A. C.	 Secure gantry crane to prevent movement during storms
Cooling tower fans	
Rotate fans 1 ¼ turn by hand weekly	 Secure fan blades to eliminate unintended rotation of gearbox
Maintain and operate lube oil pumps weekly	 Protect gearbox oil with dispersion / stabilization chemicals
Circulating water pumps	
Rotate pumps 1 ¼ turn by hand monthly	 Clean, flush, drain and winterize all circulating water pumps
Circulating water piping	
	Clean, flush, drain and winterize
	Protect pipe by increasing normal chemical concentrations
Cooling tower electrical building	
 Maintain and operate switchgear heaters 	Protect electrical cabinets with corrosion inhibitors
 Maintain access doors closed to eliminate bird entry 	 Prevent bird entry by closing all access openings
Service water pumps	
 Maintain and operate all pumps as needed, alternate monthly 	Open crosstie valve to provide firewater
Ensure heat trace and insulation are in good condition	The state of the s
Electric fire water pump	
Maintain and operate pump as needed	
Diesel fire water pump, jockey pump and water storage tank	
Refill with potable water	Install winterized piping from potable water system
 Maintain and operate diesel pump as needed, verify monthly 	Protect diesel fuel by adding stabilizer to storage tank
Maintain and test batteries per current procedure	and the state of t
 Maintain and operate jockey pump continuously, verify weekly 	
 Maintain and operate tank winterization, verify monthly 	
Maintain and operate heat trace in good condition	
 Maintain and operate sump pump as needed, verify weekly 	
Potable water building	
 Maintain and operate building heat and fire protection 	Clean, flush, drain and winterize all equipment and piping
Maintain access doors closed to eliminate bird entry	Protect equipment in place with corrosion inhibitors
Waste water clarifier	
 Rotate rake 1 ¼ turn with drive motor monthly 	Clean, flush, drain and winterize all equipment and piping
 Rotate blowdown pump 1 ¼ turn by hand monthly 	Protect tank from sunlight and birds with mesh screen cover

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 8 of 21

Lay-up Preparation

Waste water discharge pumps (KPDES 001)	
Maintain and operate pumps as needed, verify weekly	Sump can overflow to waste impoundment pond
Maintain and operate seal water and associated heat trace	Tamp san sterne was to maste impoundment point
 Continue to perform required environmental sampling 	

Turbine Building

Transformer area sump pumps	
 Maintain and operate pumps as needed, verify weekly 	
 Maintain and operate seal water and associated heat trace 	
 Isolate sump pump and seal water unless needed 	
Air compressor	
 Rotate Centac air compressors 1 ¼ turn by hand weekly 	Install an air cooled air compressor capable of 200 CFM
Maintain and operate lube oil system weekly	 Protect compressors in place with corrosion inhibitors
 Maintain and operate new compressor continuously 	Protect lube oil with dispersion / stabilization chemicals
Air dryer system	
 Maintain and operate continuously, alternate monthly 	
Vacuum pumps	
 Rotate vacuum pumps 1 ¼ turns by hand monthly 	Clean, flush, drain and winterize pumps and piping
	Protect pumps in place with corrosion inhibitors
	Protect coolers with corrosion inhibitor capsules
Auxiliary BFP lube oil system	
 Maintain and operate lube oil system weekly 	Open all vents and drains @ 400°F to boil water from vessel
 Turn rotor 1 ¼ turn by hand weekly 	Protect lube oil with dispersion / stabilization chemicals
 May require heat or continuous operating if temp < 70°F 	 Clean, flush, drain and winterize pumps and piping
 Test and analyze oil per established procedure 	
Feedwater heaters, CH-J-1A and CH-J-1B	
	Open all vents and drains @ 400°F to boil water from vessel
	Protect with dehumidification before dew point is reached
Station batteries	
Maintain and inspect per current procedure	
Laboratory area	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 9 of 21

Lay-up Preparation

	 Remove and dispose of all laboratory chemicals Clean, flush, drain and winterize boiler water sample panel
	 Protect equipment in place with corrosion inhibitors Protect electrical cabinets with corrosion inhibitors
Polisher area	- Trotect electrical cabinets with corrosion initiality
	 Remove and dispose of all media from process vessels Clean, flush, drain and winterize all process vessels
	 Protect equipment in place with corrosion inhibitors Remove insulation from vessels to prevent exterior corrosion
Chemical area sump pumps	- Kernove madiation from vessels to prevent exterior corrosion
 Maintain and operate as needed, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed 	Clean and remove any contaminants
Lube oil system includes storage tanks	
Maintain and operate lube oil system weekly	Protect lube oil with dispersion / stabilization chemicals
Maintain and operate filtration system "bowser"	, stabilization of the stabili
Maintain and operate clean and dirty storage tanks	
 May require heat or continuous operating if temp < 70°F 	
Test and analyze oil per established procedure	
Maintain and verify operation of tank cathodic protection	
Maintain and operate leak detection system	
Turbine building area sump	
Maintain and operate pumps as needed, verify weekly	Clean and remove any contaminants
Maintain and operate seal water and associated heat trace	,
 Isolate sump pump and seal water unless needed 	
Hotwell	
	 Protect with dehumidification before dew point is reached
Condenser and waterbox	
	Protect with dehumidification before dew point is reached
Closed cooling water system	
 Rotate pumps 1 ¼ turn by hand monthly 	Clean, flush, drain and winterize pumps and piping
	Protect pumps in place with corrosion inhibitors
Boiler Feed Pump Turbine	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 10 of 21

Lay-up Preparation

 Protect lube oil with dispersion / stabilization chemicals Clean, flush, drain and winterize pumps and piping
Open all vents and drains @ 400°F to boil water from vessel
Protect with dehumidification before dew point is reached
Protect EH fluid with dispersion / stabilization chemicals
 Open all vents and drains @ 400°F to boil water from vessel Protect with dehumidification before dew point is reached Install mechanical blocking devices to hold valves open
devices to note valves open
 Protect with dehumidification before dew point is reached Protect H₂ coolers, water side, with corrosion inhibitors Protect exciter coolers, water side, with corrosion inhibitors Purge and remove hydrogen from site
Bearing of the state of the sta
 Open all vents and drains @ 400°F to boil water from vessel Protect with dehumidification before dew point is reached
point is readiled
Install stand-alone HVAC system
 Open all vents and drains @ 400°F to boil water from vessel Protect with dehumidification before dew point is reached

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 11 of 21

Lay-up Preparation

Boiler Building

PA Fan	
 Maintain and operate lube oil system weekly Rotate fan 1 ¼ turn by hand weekly Maintain and operate hydraulic system weekly Stroke fan blades hydraulically weekly May require heat or continuous operating if temp < 70°F 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
FD Fan	
 Maintain and operate lube oil system weekly Rotate fan 1 ¼ turn by hand weekly Maintain and operate hydraulic system weekly Stroke fan blades hydraulically weekly May require heat or continuous operating if temp < 70°F 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
 Sump pumps Maintain and operate as needed, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed Drag chain and surge tank Maintain and operate drag chain with drive motor monthly Maintain and operate hydraulic system monthly Rotate surge tank recirc pumps 1 ½ turn by hand monthly Rotate pyrite sluice pumps 1 ½ turn by hand monthly Rotate economizer pumps 1 ½ turn by hand monthly 	 Drag chain to remain in place under boiler Clean, flush, drain and winterize drag chain and equipment Protect drag chain with corrosion inhibitors Prevent bird entry by closing all access openings Clean, flush, drain and winterize drag chain and equipment Clean, flush, drain and winterize surge tank and equipment
	 Protect surge tank with corrosion inhibitors Clean, flush, drain and winterize pH control system
Pulverizers	
 Maintain and operate lube oil system weekly Rotate table 1 ¼ turn with turning gear monthly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
CO2 System	
 Maintain and operate for fire protection 	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 12 of 21

Lay-up Preparation

Diesel generator	
Maintain and operate per current OPL	Protect diesel fuel by adding stabilizer to storage tank
 Maintain and test batteries per current procedure 	1 Lorder diesel idei på addillå stabilisel fo stolage fallk
Primary air preheater	
 Maintain and operate lube oil system weekly Rotate baskets 1 ¼ turn with air drive weekly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
Secondary air preheater	
 Maintain and operate lube oil system weekly Rotate baskets 1 ¼ turn with air drive weekly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect lube oil with dispersion / stabilization chemicals
Burners / Windbox	The state of the s
 Move burner hoods by hand monthly Rotate tertiary fans 1 ¼ turn by hand monthly Rotate scanner blowers 1 ¼ turn by hand monthly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Tripper cars and bunkers	
Rotate tripper car gearbox monthly	 Clean, flush, drain and winterize equipment Park both tripper cars over #3 bunker Protect hoppers with corrosion inhibitors Protect idler bearings by thoroughly lubricating Protect lube oil with dispersion / stabilization chemicals
Sootblowers	1 Total trade on with dispersion / stabilization chemicals
Rotate sootblower gearbox monthly	 Clean and remove fuel residue from all surfaces Protect steam piping by removing insulation and painting Protect lube oil with dispersion / stabilization chemicals Protect electrical cabinets with corrosion inhibitors
Waterwalls, superheat, reheat and economizer, fire side	1 Total clearing addition with corrosion annipitors
Maintain effective sealing to minimize moisture infiltration	 Deslag on-line to thoroughly remove slag Install airtight seal at knees Protect with dehumidification before dew point is reached
Waterwalls, superheat, reheat and economizer, water side	1 Total With definition before dew point is reached
Maintain effective sealing to minimize moisture infiltration	 Open all vents and drains @ 400°F to boil water from tubes Protect with dehumidification before dew point is reached

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 13 of 21

Lay-up Preparation

Deaerator and storage tank, CH-J-5	
Maintain effective sealing to minimize moisture infiltration	 Open all vents and drains @ 400°F to boil water from vessel Protect with dehumidification before dew point is reached
Drum	point is reached
Maintain effective sealing to minimize moisture infiltration	 Open all vents and drains @ 400°F to boil water from vessel Protect with dehumidification before dew point is reached
Penthouse	
 Maintain effective sealing to minimize moisture infiltration Rotate pressurization fans 1 ¼ turn by hand monthly 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Dead air spaces	
Maintain effective sealing to minimize moisture infiltration	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Boiler Building	
 Maintain and operate fire protection system above freezing 	 Construct enclosure to protect fire water headers Clean by dry vacuum all fuel residue from the boiler building
Ignition oil tanks	
Maintain, inspect and drain as needed storm water in berm	 Drain fuel oil to lowest level possible Protect tank by leaving small amount of fuel oil in tank Protect fuel oil with dispersion / stabilization chemicals
Ignition oil pumps	Trocoction on with dispersion y stabilization chemicals
Rotate pumps 1 ¼ turns by hand monthly	 Clean, flush, drain and winterize pumps and piping Protect pumps in place with corrosion inhibitors Protect lube oil with dispersion / stabilization chemicals
Ignition oil fire protection foam system	
Maintain and operate foam system	

SCR

Reactor and ductwork	
Maintain effective sealing to minimize moisture infiltration	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Catalyst	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 14 of 21

Lay-up Preparation

 Maintain effective sealing to minimize moisture infiltration 	Protect with dehumidification before dew point is reached
	 Clean by dry vacuum after dry air equipment is in service
Sootblowers	
 Rotate gearbox 1 ¼ turn by hand monthly 	Clean all fuel residue from all surfaces
	 Protect lube oil with dispersion / stabilization chemicals
	Protect electrical cabinets with corrosion inhibitors
Dilution air blowers	
Rotate blowers 1 ¼ turn by hand monthly	Protect blowers in place with corrosion inhibitors
	Protect duct work with corrosion inhibitors
	Protect electrical cabinets with corrosion inhibitors
Ammonia	
 Maintain residual pressure to prevent moisture infiltration 	Evacuate all liquid ammonia
	 Protect pumps in place with corrosion inhibitors

Electrostatic Precipitator

Reactor and ductwork	
Maintain effective sealing to minimize moisture infiltration	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service
Plates, wires and rappers	y y y state any an equipment to meet vice
 Maintain effective sealing to minimize moisture infiltration 	 Protect with dehumidification before dew point is reached Clean by dry vacuum after dry air equipment is in service Protect rappers with corrosion inhibitors
Precipitator area sump pumps	1. Occur appers with corresion ministrors
 Clean all flyash residue from sump and surrounding area 	
 Maintain and operate as needed to control level, verify weekly 	
 Maintain and operate seal water and associated heat trace 	
 Isolate sump pump and seal water unless needed 	
Flyash transport system	
 Rotate blowers 1 ¼ turn by hand weekly 	Clean all combustion residue from all internal surfaces
•	Protect blowers in place with corrosion inhibitors
	Protect lube oil with dispersion / stabilization chemicals

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 15 of 21

Lay-up Preparation

Flyash silo and vent fans	
 Rotate vent fans 1 ¼ turn by hand monthly Maintain access doors closed to eliminate bird entry 	 Clean all combustion residue from all internal surfaces Protect fans in place with corrosion inhibitors
	 Prevent bird entry by closing all access openings

Scrubber

ID Fan	
 Maintain and operate lube oil system weekly Rotate fan 1 ¼ turn with turning gear weekly Maintain and operate louver dampers weekly May require heat or continuous operating if temp < 70°F Maintain effective sealing to minimize moisture infiltration 	 Protect with dehumidification before dew point is reached Protect lube oil with dispersion / stabilization chemicals Clean by dry vacuum after dry air equipment is in service
Inlet duct	
 Close and seal inlet guillotine dampers Maintain effective sealing to minimize moisture infiltration 	 Protect with dehumidification before dew point is reached High pressure wash and rinse until discharge water is > 6pH Passivate all internal surfaces with a 5% solution of soda ash Dry out with heaters and seal access openings Protect seal air blowers in place with corrosion inhibitors
Reactor vessels	The state of the s
Maintain access doors closed to eliminate bird entry	 Clean, flush, drain and winterize modules and piping Lower doors open/covered by screens, access to agitators Close all other access openings
Outlet duct	elose di ottici decess opernigs
Maintain access doors closed to eliminate bird entry	 Clean, flush, drain and winterize outlet duct and drain piping Drains to remain open to allow moisture to escape Close all other access openings Protect seal air blowers in place with corrosion inhibitors
Stack	1. 12122 Bear an Stowers in place With Corrosion Himbitors
 Rotate pressurization fans 1 ¼ turn by hand monthly Stroke louver damper by hand monthly Maintain and operate sump pump as needed, verify weekly 	 Clean, flush, drain and winterize stack liner and drain piping Protect pressurization fans in place with corrosion inhibitors Protect louver dampers in place with corrosion inhibitors

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 16 of 21

Lay-up Preparation

Maintain and operate seal water and associated heat trace	
 Isolate sump pump and seal water unless needed 	
Maintain access doors closed to eliminate bird entry	
Slurry circulation pumps	
 Rotate pumps 1 ¼ turn by hand monthly Maintain doors closed to eliminate bird entry to pump houses 	 Clean, flush, drain and winterize pumps and piping Protect bearing cartridges by thoroughly lubricating Release belt tension and apply corrosion inhibitors to drives
Agitators	
Rotate agitator impeller 1 ¼ turn by hand monthly	 Clean, flush, drain and winterize agitators Protect lubricant with dispersion / stabilization chemicals Release belt tension and apply corrosion inhibitors to drives
Blowdown	
 Rotate pumps 1 ¼ turn by hand monthly Maintain sump level with a portable sump pump 	 Clean, flush, drain and winterize pumps Clean all slurry accumulations from all trenches and sumps Protect bearing cartridges by thoroughly lubricating Release belt tension and apply corrosion inhibitors to drives
Thickeners	
 Rotate rake 1 ¼ turn with drive motor monthly Maintain and operate sump pumps as needed, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed 	 Clean, flush, drain and winterize thickeners Clean all slurry accumulations from sump and trenches Protect support bearing by thoroughly lubricating Protect lubricant with dispersion / stabilization chemicals Remove pump suctions to allow rainwater to drain to sump
Underflow	
 Rotate underflow pumps 1 ¼ turn by hand monthly Maintain and operate sump pumps as needed, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed Maintain access doors closed to eliminate bird entry 	 Clean, flush, drain and winterize underflow pumps and piping Protect gearbox oil with dispersion / stabilization chemicals Prevent bird entry by closing all access openings

Ballmill area

Ballmill	
Daining	f I
	· · · · · · · · · · · · · · · · · · ·

Lay-up Preparation

 Rotate ballmill 1 ¼ turn with drive motor weekly Maintain and operate jacking and lube oil pumps weekly 	 Build containment area and drop ball charge on floor Remove, sort and drum ball charge or sell to supplier
	Clean, flush, drain and winterize ball mills
	Protect lubricant with dispersion / stabilization chemicals
Product sump and pumps	and the state of t
Rotate sump pumps 1 ¼ turn by hand monthly	 Clean, flush, drain and winterize sumps and pumps Protect bearing cartridges by thoroughly lubricating
Ballmill building	Release belt tension and apply corrosion inhibitors to drives
 Maintain and operate floor sumps as needed, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed Maintain access doors closed to eliminate bird entry 	 Clean, flush, drain and winterize building Prevent bird entry by closing all access openings
Ballmill building electrical rooms Maintain and operate switchgear heaters	Protect electrical cabinets with corrosion inhibitors
Limestone silo	The state of the s
Maintain access doors closed to eliminate bird entry	 Clean all limestone from silo interior Clean all limestone from the equipment level and ground floor Protect conveyor idler bearings by thoroughly lubricating Prevent bird entry by closing all access openings
Limestone prep building	- Trevent bird entry by closing all access openings
 Rotate pumps 1 ¼ turn by hand monthly Maintain access doors closed to eliminate bird entry 	 Clean, flush, drain and winterize sumps and pumps Protect electrical cabinets with corrosion inhibitors Prevent bird entry by closing all access openings

CSI

Vacuum filter drums	
vacuum mee drums	
 Rotate drums 1 ¼ turn with drive motor monthly Rotate agitator with drive motor monthly 	 Clean, flush, drain and winterize drums and piping Vats shall be left empty Protect lube oil with dispersion / stabilization chemicals
	Remove and dispose of filter cloth and attachment rope

Lay-up Preparation

Surge tanks and filter feed pumps	
Rotate pumps 1 ¼ turn by hand monthly	 Clean, flush, drain and winterize pumps and piping Tanks shall be left empty Protect bearing cartridges by thoroughly lubricating Release belt tension and apply corrosion inhibitors to drives
Filtrate return pumps	
Rotate pumps 1 ¼ turn by hand monthly	 Clean all slurry residue from all surfaces Sump shall be left empty Release belt tension and apply corrosion inhibitors to drives
Solid waste area sump pumps	
 Maintain and operate as needed to control level, verify weekly Maintain and operate seal water and associated heat trace Isolate sump pump and seal water unless needed 	Clean all FGD residue from sump and surrounding area
Conveyors	
Maintain and operate conveyor monthly	 Clean slurry from all surfaces Protect idler bearings by thoroughly lubricating Place stackout conveyor in the lowest possible position Secure stackout conveyor to prevent movement during storms
Building	occurs outstant conveyor to prevent movement during storms
 Maintain and operate switchgear heaters Maintain access doors closed to eliminate bird entry 	 Clean slurry from all surfaces Floor drains and sumps shall be left empty Prevent bird entry by closing all access openings Protect electrical cabinets with corrosion inhibitors

Landfill

Landfill cover	
Maintain landfill mowing, permit requirement	Place temporary cover on all active areas of landfill
 Maintain landfill erosion control, permit requirement 	
Landfill sample wells	
Continue to perform required environmental sampling	
Landfill runoff pond (KPDES 002)	

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 19 of 21

Lay-up Preparation

Maintain and operate as needed to control level		
Perform required environmental sampling		

Buildings and Grounds

Site Security & Communication	
Maintain Gai-tronics for emergency alarms	Security patrols to be performed by operational personnel
Maintain radios/repeaters for personnel communication	Winterize above ground fire protection system or lay-up dry
 Maintain and operate underground fire protection system 	grand ma protestion system of tay up ary
 Maintain and operate all plant lighting for safety and security 	
Maintain and operate stack strobe lights	
Maintain and operate all entrance gates for security	
Maintain and operate all security cameras	
Buildings and Facilities	
 Maintain and inspect cathodic protection, 3 year inspection 	
 Maintain and inspect radiation sources, twice a year inventory 	
Maintain and inspect fire extinguishers	
Maintain and inspect eye wash stations	
 Maintain and inspect outlying restroom facilities 	
 Maintain and inspect elevators, annual certification required 	
 Maintain and operate all outlying HVAC systems 	
 Maintain and operate all building sprinkler systems 	
Maintain current mowing and weed control	
Sewage treatment plant (KPDES 007)	
 Waste water operator licensed personnel required 	
 Maintain and operate sewage treatment plant, verify weekly 	
 Maintain and operate sewage lift stations, verify weekly 	
 Perform required environmental sampling 	
Plant Vehicles	
 Maintain water truck to transport water 	Heavy equipment transferred to other stations
	Emergency response vehicle to Green Station
	Majority of plant vehicles transferred to other stations

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 20 of 21

Lay-up Preparation

Staffing

Layup Staffing

- 2 Supervisors
- 5 Control Room Operators
- 5 Auxiliary Operators
- 1 Laboratory Operator
- 1 Mechanic
- 1 Electrician
- 1 Instrument Technician

Case No. 2013-00199, Attachment for Response to AG 1-104, Witness: Robert W. Berry, Page 21 of 21

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 105)	If Big Rivers decides to idle the Wilson plant, which carries the lowest
2	variable cost	s on Big Rivers' system, describe how this will change MISO's economic
3	dispatch of l	Big Rivers' generation units.
4	<i>a</i> .	Does Big Rivers agree that if Wilson is idled, its sales to MISO will be
5		reduced? If not, why not?
6	b.	Provide an analysis of Big Rivers' expected sales to MISO through all of the
7		forecasted test period, both with Wilson being idled, and with Wilson not
8		being idled.
9	с.	In the event Big Rivers idles the Wilson plant, please confirm that the plant
10		will remain in the company's rate base and that ratepayers will continue to
11		pay for various costs associated with the plant.
12	d.	Please confirm that the budget included in the filing, which forms the basis
13		for Big Rivers' fully forecasted test period assumes Wilson is idled.
14	e.	Please provide a summary depicting the expected net total projected savings
15		of shuttering the plant, for as long of a time period as such projections have
16		been made.

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	f.	Please provide the specific amount of cost that Big Rivers' ratepayers will
2		bear for keeping the Wilson plant in the company's rate base in the event
3		the plant is idled.
4	Response)	
5	a.	Agreed.
6	b.	Big Rivers sells all of its generation into and purchases all of its load from
7		MISO. Big Rivers' forecasted generation sold to MISO with Wilson idled
8		during the forecasted test period is MWh. Big Rivers' forecasted
9		generation sold to MISO with Wilson operating during forecasted test period
10		is MWh.
11	c.	Confirmed.
12	d.	Confirmed.
13	e.	Big Rivers objects to the use of the unduly vague and ambiguous term
14		"shuttering." Big Rivers further states that it does not intend to retire Wilson
L5		Station. Notwithstanding these objections, and without waiving them, Big
L6		Rivers states that it intends to idle Wilson Station. Big Rivers' analysis
L7		estimates that idling the Wilson Station will save its Members a total of
L8		approximately \$73 Million in fixed costs during the 2014-2016 timeframe.

Case No. 2013-00199 Response to AG 1-105 Witness: Robert W. Berry Page 2 of 3

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	f.	As a result of having Wilson remain in t	he rate base, Big Rivers' Members
2		will continue to pay the interest, depreci	ation, insurance, and property taxes
3		on the Wilson Station, as well as the cos	t of maintaining the unit in an idled
4		state.	
		Depreciation	20,177,365
		Property Tax	1,097,363
		Property Insurance	1,252,679
		Interest Expense	20,981,499
		Fixed Department Expense	
		Labor/Labor Overhead	1,636,619
5		Total for FTP	
6			

Witness) Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 106)	If Big Rivers decides to idle the Coleman plant upon completion of the SSR
2	with MISO,	describe how this will change MISO's economic dispatch of Big Rivers'
3	generation i	units.
4	<i>a</i> .	Does Big Rivers agree that if Coleman is idled, its sales to MISO will be
5		reduced? If not, why not?
6	b.	Provide an analysis of Big Rivers' expected sales to MISO through all of the
7		forecasted test period, both with Coleman being idled, and with Coleman no
8		being idled.
9	<i>c</i> .	In the event Big Rivers idles the Coleman plant, please confirm that the
10		plant will remain in the company's rate base and that ratepayers will
11		continue to pay for various costs associated with the plant.
12	d.	Please confirm that the budget included in the filing, which forms the basis
13		for Big Rivers' fully forecasted test period assumes Coleman is idled.
14	е.	Please provide a summary depicting the expected net total projected savings
15		of shuttering the plant, for as long of a time period as such projections have
16		been made.

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	f.	Please provide the specific amount of cost that Big Rivers' ratepayers will
2		bear for keeping the Coleman plant in the company's rate base in the event
3		the plant is idled.
4		
5	Response)	
6	a.	Agreed.
7	b.	Big Rivers sells all of its generation into and purchases all of its load from
8		MISO. Big Rivers' forecasted generation sold to MISO with Coleman idled
9		during the forecasted test period is MWh. Big Rivers' forecasted
10		generation sold to MISO with Coleman operating during forecasted test period
11		is MWh.
12	c.	Confirmed.
13	d.	Coleman is assumed idled starting on February 1, 2014, with related
14		headcount reductions as of May 1, 2014. Any non-recurring costs for
15		Coleman in the fully forecasted test period (labor and non-labor) are included
16		in a pro forma adjustment to reduce the revenue requirement. Please refer to
17		Exhibit Wolfram-2 from the Direct Testimony of Mr. John Wolfram for all
18		pro forma adjustments.

Case No. 2013-00199 Response to AG 1-106 Witness: Robert W. Berry Page 2 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	e.	Big Rivers objects to the use of the	unduly vag	ue and ambiguous term	
2		"shuttering." Big Rivers further sta	ites that it do	oes not intend to retire	
3		Coleman Station. Notwithstanding	these object	tions, and without waiving	
4		them, Big Rivers states that it intend	ds to idle Co	oleman Station. Big Rivers'	
5		analysis estimates that idling the Co	oleman Stati	ion will save its Members a	
6		total of approximately \$78 Million	in fixed cos	ts during the 2014-2016	
7		timeframe.			
8	f.	As a result of remaining in the rate	base, Big R	ivers' Members will continue	3
9		to pay the interest, depreciation, ins	urance, and	property taxes on the Colem	an
10		Station, as well as the cost of maint	aining the u	nit in an idled state.	
11		,	C		
		Depreciation Property Tax Property Insurance Interest Expense **Fixed Department Expense ** Labor/Labor Overhead	\$	6,466,191 476,341 732,474 6,786,057	
12		Total for FTP	\$	1,500,832	
13		**Pro Forma adjustments have been	n applied.		

14

Case No. 2013-00199 Response to AG 1-106 Witness: Robert W. Berry

Page 3 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1 Witness) Robert W. Berry

Case No. 2013-00199 Response to AG 1-106 Witness: Robert W. Berry Page 4 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 107)	Please provide a copy of any and all economic analysis(es) upon which Big
2	Rivers bases	or will base its decision to close the Wilson generation unit, and/or any other
3	generation un	nit(s).
4	a. Expla	in fully why idling Wilson is better and more cost-effective than selling it.
5		
6	Response)	Please see Big Rivers' response to AG 1-108(a) in Case No 2012-00535.
7		

Witness) Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 108) Has MISO performed any studies upon which Big Rivers will or may rely in
2	making any decision regarding the idling of any particular plant? If so, please provide a
3	copy of any and all such studies, and any other documents related thereto.
4	
5	Response) On December 19, 2012, Big Rivers submitted to MISO an Attachment Y-2,
6	Request for Non-Binding Study Regarding Potential SSR Status for Big Rivers' Coleman
7	Station. The confidential Y-2 report titled Attachment Y-2 Study Report May 2, 2013 is
8	attached. On May 24, 2013 Big Rivers submitted to MISO an Attachment Y notice for the
9	suspension of Coleman Units 1, 2 & 3. A redacted MISO Attachment Y Study Report titled
10	Attachment Y Study Report July 18, 2013 Draft was provided in response to KIUC 1-46(e).
11	On December 28, 2012, MISO received an Attachment Y-2 request for Non-Binding
12	Study Regarding Potential SSR Status for Big Rivers' Wilson Unit 1. The confidential Y-2
13	report titled Attachment Y-2 Study Report Final June 12, 2013 is attached. Big Rivers has
14	requested additional Y-2 studies for suspensions of Wilson Unit 1 and Green Units 1 & 2.
15	These studies are on-going.
16	
17	Witness) Robert W. Berry

Case No. 2013-00199 Response to AG 1-108 Witness: Robert W. Berry Page 1 of 1

CONFIDENTIAL ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1 Item 109) Reference the Williams Testimony, p. 14, l. 12, why does the forecast
2 assume that severance costs for Coleman layup will begin in February 2014 when the
3 Century Agreement assumes Coleman operation until after May of 2014? Please update
4 forecast and affected numbers to reflect the Century Agreement.
5
6 Response) Please see Big Rivers' response to PSC 2-25.

Jeffrey R. Williams

8

Witness)

Case No. 2013-00199 Response to AG 1-109 Witness: Jeffrey R. Williams Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 110) Prov	vide a cost-benefit analysis which illustrates the total of all costs
2	associated with idl	ing generation plant(s) (including but not limited to stranded costs),
3	contrasted with the	costs of leaving the plant(s) running.
4		
5	Response) Big	Rivers objects to the characterization of the costs described here as
6	"stranded costs." N	Notwithstanding this objection, but without waiving it, please see Big
7	Rivers' response to	KIUC 1-67.
8		

Robert W. Berry

9

Witness)

Case No. 2013-00199 Response to AG 1-110 Witness: Robert W. Berry Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- Item 111) Please provide all Big Rivers correspondence to RUS that includes the subject of "scheduled major inspections and maintenance per prudent utility operations" since January 1, 2012.

 Response) Please refer to Big Rivers' responses to AG 1-142, PSC 2-15, and PSC 2-30 in Case No. 2012-00535.
- 8 Witness) Billie J. Richert

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 112)	Please provide assumptions, data, and summary of fuel procurement
2	contracts Big	g Rivers provided to ACES in development of the production cost modeling
3	used as an ir	put to the Big Rivers Financial forecast used in this case. Information should
4	include spre	adsheets, etc., in electronic format compatible with Microsoft Office programs.
5		
5	Response)	Please see Big Rivers' response and attachments to KIUC 1-12(b).
7		
2	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

Item 113) Please provide production cost model output data received from ACES for
inclusions in the Big Rivers financial forecast used in this case. Information should
include input and output spreadsheets, etc. in electronic format compatible with Microsoft
Office programs.
Response) Please see Big Rivers' response to PSC 2-14.

8

Witness)

Robert W. Berry

Case No. 2013-00199 Response to AG 1-113 Witness: Robert W. Berry Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 114)	Please provide any changes to information provided to ACES or production
2	cost model or	utputs from implementation of the Load Concentration Mitigation plan.
3		
4	Response)	Please see Big Rivers' response to KIUC 1-12(b,d-g) for production cost
5	model inputs	. Fuel forecasts, planned outage schedules, and load forecast have been changed
6	due to impler	mentation of the Load Concentration Mitigation plan. Please see Big Rivers'
7	response to A	AG 1-98 listing the PCM runs with many of those runs being performed due to
8	implementati	on of the Load Concentration Mitigation plan.
9		
10	Witness)	Robert W. Berry

Case No. 2013-00199 Response to AG 1-114 Witness: Robert W. Berry Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- Item 115) Please provide details of the emission fee budget included in the Big Rivers

 financial forecast used in this case. Information should include spreadsheets, etc. in

 electronic format compatible with Microsoft Office programs.

 Response) Please see Big Rivers' response to KIUC 1-61 for details of the emission fee budget calculations.
- 8 Witness) Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 116)	Given that the U.S. Army Corps of Engineers repair work to Wolf Creek
2	dam is being	completed ahead of schedule, has Big Rivers performed any analyses or
3	studies regar	rding:
4	<i>a</i> .	when the Southeastern Power Administration (SEPA)'s provision of 178
5		MW of power to Big Rivers will be restored; and
6	<i>b</i> .	if so, whether that could change Big Rivers' order of economic dispatch? If
7		your response to either (a) and/or (b) above is "yes," please provide copies
8		of any and all such analyses/studies, and any and all other documents
9		associated therewith.
10		
11	Response)	
12	a.	Big Rivers objects to this request as no entity can reasonably perform analyses
13		or studies that can predict with any certainty SEPA's internal decision making
14		processes for determining when to end the SEPA contract Force Majeure.
15		Notwithstanding this objection, and without waiving the same, Big Rivers
16		states as follows. In April 2013 a Big Rivers employee attended a meeting
17		between SEPA, the U.S Army Corps of Engineers ("USACE") and SEPA
18		customers. At that meeting USACE confirmed that Wolf Creek dam repairs

Case No. 2013-00199 Response to AG 1-116 Witness: Robert W. Berry Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		were ahead of schedule. SEPA indicated that the Force Majeure was
2		expected, but not guaranteed, to terminate no later than the end of 2014.
3	b.	As a member of MISO, Big Rivers does not determine the order of dispatch of
4		its units. MISO dispatches generation to optimize system reliability and
5		economics. However, Big Rivers offers the following. Upon exiting the
6		Force Majeure, Big Rivers will schedule SEPA within the limits set forth in
7		the SEPA contract while optimizing Member value of the SEPA resource.
8		
9	Witness)	Robert W. Berry

Case No. 2013-00199 Response to AG 1-116 Witness: Robert W. Berry Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 117) Please refer to page 33 of the PSC Order in Case No. 2007-00455 dated
2	March 6, 2009, where the Commission finds "all necessary actions to correct the
3	deficiencies are scheduled to be performed as part of Big Rivers' 2009 – 2011 Production
4	Work Plan." Provide documents which show each of the deficiencies, and the date at
5	which they were corrected by Big Rivers per the Production Work Plan.
6	
7	Response) Big Rivers takes very seriously its obligation to maintain its assets in
8	accordance with prudent utility practice. The Big Rivers 2009 – 2011 Production Work Plan
9	provides direction of activities related to inspections and maintenance on its assets. Big
10	Rivers has selectively deferred certain inspection and maintenance activities recommended
11	by experienced plant staff but never has Big Rivers deferred maintenance activities that
12	would knowingly put assets at risk or create safety concerns. When Big Rivers resumed
13	control of the generating units in 2009 no major equipment deficiencies were identified, and
14	since 2009 the units have consistently performed in the top quartile of its peer group in
15	Equivalent Forced Outage Rate (EFOR), Equivalent Availability Factor (EAF) and Net
16	Capacity Factor (NCF). To further support these facts, the Coleman Station has received the
17	Navigant Operational Excellence Award for two consecutive years, (2012 & 2013).
18	Please also see Big Rivers' response to AG 1-203 in Case No. 2012-00535.

Case No. 2013-00199 Response to AG 1-117 Witness: Robert W. Berry Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1

2 Witness) Robert W. Berry

Case No. 2013-00199 Response to AG 1-117 Witness: Robert W. Berry Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

Identify each of these deficiencies which were not corrected within the 2009 Item 118) 1 - 2011 Production Work Plan (if any). 2 3 Please see Big Rivers' response to AG 1-117. 4 Response) 5 Robert W. Berry Witness)

6

Case No. 2013-00199 Response to AG 1-118 Witness: Robert W. Berry Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	item 119) Referencing Exhibit Berry 2, please provide a detailed explanation of the
2	necessity for each of the 2014, 2015 and 2016 capital expenditure items for Wilson,
3	including in your response why these expenditures are planned or needed if Big Rivers
4	plans to idle Wilson beginning February 2014.
5	
6	Response) When the Wilson Station 2013-2016 capital plan was developed, there was
7	some significant uncertainty surrounding the timing of the lay-up and restoration, and Big
8	Rivers deemed it prudent to include some capital funding for Wilson until MISO could
9	determine if it was going to be possible to idle the unit, and for how long. Big Rivers filed a
10	Attachment Y2 request with MISO for a Non-Binding Study Regarding Potential SSR to
11	determine the reliability impact of the suspension of Wilson Unit 1 from August 20, 2013 to
12	January 1, 2015, with Century's Hawesville smelter and the Coleman Station both continuing
13	to operate. The study results indicated that during the suspension period no potential
14	transmission reliability issues were identified to require the need for a System Support
15	Resource ("SSR") contract. However, beyond the requested suspension period, potential
16	reliability issues were identified starting in 2017 that suggest the unit will be needed in the
17	future.

Case No. 2013-00199 Response to AG 1-119 Witness: Robert W. Berry Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Big Rivers has filed another Attachment Y2 request with MISO to determine if the		
2	Wilson Unit can be idled with Century's Hawesville smelter continuing to operate and the		
3	Coleman Station idled. This study has not yet been completed so there is still some		
4	uncertainty regarding the timing of the lay-up and restoration of the Wilson Unit. Big River		
5	still believes it prudent to budget some capital funding for Wilson Station until MISO		
6	determines if it is going to be possible to idle the unit, and for how long.		
7			
8	Witness) Robert W. Berry		

Case No. 2013-00199 Response to AG 1-119 Witness: Robert W. Berry Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 120)	Referencing Exhibit Berry 2, please describe in detail the units and work
2	involved for	the HAPS/MATS capital construction in 2014.
3		
4	Response)	During the year 2014, Big Rivers plans to install activated carbon injection
5	equipment, c	lry sorbent injection equipment, and continuous emission monitoring equipment,
6	in order to ve	erify MATS compliance, on its Green Station Units 1 and 2. Also in 2014, Big
7	Rivers will c	oordinate installation of continuous emission monitoring equipment for HMP&L
8	on its Station	Two Units 1 and 2 in order to verify MATS compliance.
9		
10	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 121)	Referring to BREC's response to PSC 1-12:
2	<i>a</i> .	Please provide the last two long-range models and studies Big Rivers has
3		performed or participated in to meet SERC regional long-term study
4		objectives.
5	b.	Regarding Big Rivers' internal long-term transmission assessment prepared
6		to ensure compliance with NERC standards using the SERC-developed
7		models:
8		i. Please provide copies of all audits, reports and studies used as a
9		basis of Big Rivers' last two long-term transmission assessments.
10		ii. Please provide the results of the last two Big Rivers' long-term
11		transmission assessments.
12	с.	Regarding the last two Big Rivers internal long-range engineering plan:
13		i. Provide all supporting load flow models and additional studies used
14		in developing the plans.
15	d.	Regarding the input Big Rivers has into the MISO MTEP:
16		i. Provide copies of all study and information Big Rivers has provided
17		into this process.
18		

Case No. 2013-00199 Response to AG 1-121 Witness: David G. Crockett Page 1 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1	Response)	
2	a.	Approximately 19 participants collectively prepare future year studies to meet
3		SERC regional long-term study objectives. The last two regional long range
4		studies in which Big Rivers participated are the CONFIDENTIAL SERC
5		report entitled "2016 Summer Future Year Study" included as electronic
6		Attachment 1 and the CONFIDENTIAL SERC report entitled "2017 Summer
7		Future Year Study" included as electronic Attachment 2. The study models
8		are based on Eastern Interconnection Reliability Assessment Group
9		("ERAG") Multiregional Modeling Working Group ("MMWG") power flow
10		models. The release and distribution of these confidential models is the
11		responsibility of the MMWG regional coordinators. The SERC Reliability
12		Corporation should be contacted for additional information.
13	b.	Big Rivers prepares internal long-term assessments to ensure compliance with
14		NERC TPL standards. The assessments are primarily based on studies
15		performed by Big Rivers. The assessments also include a summary of SERC
16		and MISO studies. The information and study results on which the last two
17		assessments were based are contained in the CONFIDENTIAL report entitled
18		"2022 Summer Transmission System Assessment" included as electronic Case No. 2013-00199 Response to AG 1-121 Witness: David C. Crackett

Witness: David G. Crockett

Page 2 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		Attachment 3 and in the CONFIDENTIAL report entitled "2015 Long Term
2		Summer Transmission System Assessment" included as electronic
3		Attachment 4.
4	c.	The CONFIDENTIAL December 2009 report entitled "Long Range
5		Engineering Plan" for the period 2012-2024 is included as electronic
6		Attachment 5. The CONFIDENTIAL August 2002 report entitled
7		"Transmission System Long Range Plan" for the period 2006-2017 is
8		included as electronic Attachment 6. The reports contain the information and
9		study results used in developing the plans. The study models used by Big
LO		Rivers in running these internal planning studies are based on additional
.1		Eastern Interconnection Reliability Assessment Group ("ERAG") Multi-
12		regional Modeling Working Group ("MMWG") power flow models similar to
.3		those identified in Big Rivers' response to subpart (a). Again, the release and
.4		distribution of these confidential models is the responsibility of the MMWG
.5		regional coordinators.
.6	d.	Big Rivers has provided input to the MTEP11 and MTEP12 study process
.7		primarily through a review of MISO study results. This input is reflected in
.8		the MISO MTEP study reports. Big Rivers also provided direct input by Case No. 2013-00199 Response to AG 1-121 Witness: David G. Crockett

Page 3 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

13	Witness)	David G. Crockett
12		
11		Attachment 9.
10		system. This document is attached electronically as CONFIDENTIAL
9		MISO as part of the MTEP process specifically applied to the Big Rivers
8		"Transmission Planning Criteria and Guidelines" document was provided to
7		CONFIDENTIAL electronic Attachment 8. The Big Rivers document entitled
6		by Big Rivers to MISO for this out-of-cycle study is shown in
5		potential addition of an industrial load. The confidential information provided
4		by Big Rivers. The purpose of this confidential study was to evaluate the
3		Attachment 7. In October of 2011, a MISO out-of-cycle study was requested
2		included in the MISO database are shown in CONFIDENTIAL electronic
1		updating the confidential MISO project database. The Big Rivers projects

Case No. 2013-00199 Response to AG 1-121 Witness: David G. Crockett Page 4 of 4

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 122)	Referring to BREC's response to PSC 1-17:
2	<i>a</i> .	Please explain why the costs and details of the construction project the 6 th
3		line down from the top of page 5 of 60 is considered confidential.
4	<i>b</i> .	Please review other confidential rows and confirm they are also
5		appropriately classified.
6		
7	Response)	
8	a.	The costs and details of that project are confidential because, as Big Rivers'
9		response to PSC 1-17 indicates, that project was in progress. Please also see
10		Big Rivers' petition for confidential treatment accompanying Big Rivers'
1 1		responses to the Commission Staff's First Request for Information.
12	b.	Confirmed.
l3		
L 4	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 123)	Reference Mr. Berry's testimony at p. 14, l. 10-12, where he states that the
2	fully forecas	ted test year assumes that Wilson and Coleman Stations will be idled as a
3	result of the	Century and Alcan terminations. Address the following:
4	<i>a</i> .	Provide all increases and decreases in revenues, expenses, depreciation
5		expense, plant investment, accumulated depreciation, and all other costs
6		(expenses and rate base components) related to the idling of the Wilson and
7		Coleman stations (show all impacts separately for Wilson and Coleman) by
8		account number and account description for actual FY 2012, base period
9		(show actual and forecasted amounts separately), forecasted test period, and
10		2016 forecasted period.
11	<i>b</i> .	Identify all overlap of revenues and costs related to the idling of Wilson in
12		the prior rate case, CN 00535 and in the current rate case, CN 00199, and
13		show the impact for the base period (provide actual and forecasted amounts
14		separately) and the forecasted test period. Provide supporting
15		documentation and calculations and explain why this overlap of revenues
16		and costs is reasonable and does not represent reflect a double impact of
17		this issue in both rate cases.

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	С.	The forecasted test period in the prior rate case CN 00535 was for the period
2		September 1, 2013 through August 31, 2014, and the forecasted period in
3		this case is for the period February 1, 2014 (date of Alcan termination)
4		through January 28, 2015. There is an overlap of the same seven months of
5		February 2013 through August 2013 in the forecasted test periods of these
6		two cases. For each month of February 2013 through August 2013 for the
7		prior case CN 00535 and the current case CN 00199, show the impact of the
8		idling of the Wilson plant by account number and account description for
9		each expense and rate base component (including all revenues, expenses,
10		depreciation expense, plant investment, accumulated depreciation, and all
11		other costs) impacted and included in both cases. Explain the reasons for
12		all differences in each cost between these two rate cases for the same
13		forecasted test period months.
14	d.	Regarding (c) above, in all cases, explain and quantify the changes in
15		inputs, assumptions, and all other changes to the Financial Model that
16		caused a change in these amounts and explain why it was necessary to
17		change assumptions and inputs to the Financial Model for the same months
18		in forecasted test period of prior rate case CN 00535 compared to the

Case No. 2013-00199 Response to AG 1-123 Witness: Jeffrey R. Williams Page 2 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		current rate case CN 00199. Provide related supporting documentation and
2		calculations and citations to all changes in the Financial Model by specific
3		field, row, column, tab, and other reference.
4		
5	Response)	Big Rivers objects that this question is overly broad and unduly burdensome.
6	Notwithstand	ling this objection, and without waiving it, Big Rivers responds as follows.
7	a.	For the forecasted periods, Big Rivers does not have a budget with Coleman
8		and Wilson running so there is nothing to compare. For historical periods,
9		actuals are actual; and Big Rivers has not done the type of comparison
10		requested comparing actuals for 2012 (where Coleman and Wilson were not
11		idled) to some set of assumptions with Coleman and Wilson idled.
12		Depreciation expense would only have a minimal change to any new assets
13		that may have been added if plants were operational. Otherwise, depreciation
14		expense does not change depending on whether the plants are idled or not.
15	b.	The forecast filed in Case No. 2012-00535 assumed the Sebree smelter
16		continued to be on the Big Rivers system and that Big Rivers idled one plant.
17		The forecast filed in this case assumes both the Hawesville and Sebree
18		smelters are not on the Big Rivers system and that Big Rivers idles two plants.

Case No. 2013-00199 Response to AG 1-123 Witness: Jeffrey R. Williams Page 3 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

.2	Witness)	Jeffrey R. Williams
11		
10	d.	Not applicable.
9		Big Rivers' response to AG 1-86.
8		thus, there is no impact from idling Wilson during this time. Please also see
7	c.	Big Rivers did not idle Wilson from February 2013 through August 2013;
6		revenues for the forecasted period.
5		Case No. 2012-00535, and it includes all of Big Rivers' expenses and
4		in this case supersedes the seven month overlap period with forecast filed in
3		costs and revenues in the other forecast. Instead, the forecast Big Rivers filed
2		Rivers does not add the costs and revenues from one forecast on top of the
1		There is no "double impact" or overlap of costs and revenues because Big

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 124)	Reference Mr. Berry's testimony at p. 14, l. 10-12, where he states that the
2	fully forecas	ted test year assumes that Wilson and Coleman Stations will be idled as a
3	result of the	Century and Alcan terminations. Address the following:
4	<i>a</i> .	Explain if Big River's calculation for the impacts of idling Wilson and
5		Coleman stations represent one year of related impacts on costs or if Big
6		River's calculations incorporate impacts for numerous years, and provide
7		the impacts of the idling for each year for both Wilson and Coleman. Show
8		these costs for the base period (show actual and forecasted amounts
9		separately) the forecasted test period, and forecasted 2016.
10	<i>b</i> .	Explain if Big River's calculation for the impacts of idling Wilson and
11		Coleman in the base period and forecasted test period of this rate case
12		includes the one-time eventual "re-start" or "start-up costs", and provide
13		these amounts by account number (and description of type of cost), provide
14		supporting documentation and calculations, and explain why these costs
15		should be included in this rate case. Show these costs for the base period
16		(show actual and forecasted amounts separately) the forecasted test period,
17		and forecasted 2016.

Case No. 2013-00199 Response to AG 1-124 Witness: Robert W. Berry Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	<i>c</i> .	Provide the "re-start" or "start-up costs" of Wilson and Coleman after the
2		have been idled and show these amounts by account number (and
3		description of type of cost) for the related year these costs would be
4		incurred, and provide supporting documentation and calculations.
5		
6	Response)	
7	a.	Please see the CONFIDENTIAL electronic file labeled "Financial Forecast
8		(2014-2027) 5-16-2013" which was provided in response to PSC 2-14.
9	b.	No. The base period and forecasted test period do not include the one-time
10		eventual "start-up costs" because the model predicts the units will restart in
11		2018 and 2019, which is outside of the submitted forecast in this case (2014-
12		2016).
13	c.	Please see the CONFIDENTIAL electronic file labeled "Financial Forecast
14		(2014-2027) 5-16-2013" which was provided in response to PSC 2-14.
15		
16	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 125)	Reference Mr. Berry's testimony at p. 19, l. 1-9, where he states that Big
2	Rivers has i	ncluded a projection of all charges and credits related to participation in all
3	three MISO	markets, including administration fees, energy-related revenues and charges,
4	transmission	n revenues and charges, FTR-related revenues and charges, capacity costs, and
5	costs which	MISO passes on to all market participants. Also, at p. 19, l. 6-9, he states that
6	in addition t	o the energy-related revenues and charges, Big Rivers also included
7	\$6,891,119 i	n net charges and credits for MISO in the forecasted test period. Address the
8	following:	
9	<i>a</i> .	Explain in more detail the types of charges and credits described at Mr.
10		Berry's testimony, p. 19, lines 1-9, versus those charges described at p. 19, l.
11		6-9. Explain if the \$6,861,119 in net charges and credits relates to all costs
12		for p. 19, l. 1-9 or only includes the costs for amounts related to lines 6-9. In
13		all cases, show all MISO and related charges and credits by account
14		number and by type of cost (and provide a description of each cost), and
15		provide these amounts for the base period (show actual and forecasted
16		amounts separately) and the forecasted test period.

Case No. 2013-00199 Response to AG 1-125 Witness: Robert W. Berry Page 1 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	b.	Regarding (a), provide copies of all contracts and supporting documentation
2		and calculations and reconcile these amounts to the charges and credits
3		included in the base period and forecasted test period.
4	с.	Regarding (a), explain when the arrangement with MISO will begin and
5		provide copies of all invoices to date and reconcile to contract amounts and
6		amounts included in this rate case.
7	d.	Identify and explain all MISO costs included in the base period and
8		forecasted test period of the prior rate case CN 00535 by account number
9		and description, and explain why these costs in the current rate case have
10		changed and provide copies of supporting documentation and calculations.
11		
12	Response)	
13	a.	Big Rivers objects that this request is overly broad and unduly burdensome
14		insofar as it seeks the requested data by account number, type of cost, and
15		descriptions of costs. Notwithstanding this objection, and without waiving it,
16		Big Rivers states as follows. Berry Testimony, lines 1-6, describes all MISO
17		charges and credits. Berry Testimony, lines 6-9, differentiates the total MISO
18		charges and credits discussed above into two categories—those that are

Case No. 2013-00199 Response to AG 1-125 Witness: Robert W. Berry Page 2 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		captured in the production cost model runs performed by ACES, as well as
2		those that are budgeted outside of the production cost model. Please see the
3		attached electronic documents provided with a petition for confidential
4		treatment.
5	b.	MISO has available on their website "Agreements Designated under the
6		MISO Tariff". Included on this page are executed contracts with Big Rivers.
7		Please visit
8		https://www.misoenergy.org/Library/Agreements/Pages/Agreements.aspx for
9		applicable contracts. Also, please see the MISO Business Practices Manuals
10		available at
11		https://www.misoenergy.org/Library/BusinessPracticesManuals/Pages/Busine
12		ssPracticesManuals.aspx for a complete description of all MISO charges and
13		credits.
14	c.	Big Rivers integrated into MISO in December 2010. Please see attached
15		electronic invoices, provided under petition for CONFIDENTIAL treatment,
16		for the base period actuals in this instant case.
17	d.	Please see Big Rivers' responses to subparts (a) and (b) above.
18		

Case No. 2013-00199 Response to AG 1-125 Witness: Robert W. Berry Page 3 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1 Witness) Robert W. Berry

Case No. 2013-00199 Response to AG 1-125 Witness: Robert W. Berry Page 4 of 4

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	item 120)	Reference Mr. Berry's lesitmony at p. 19, i. 10-18, where he states that Big
2	Rivers has it	ncluded projected amounts of \$2,271,665 for ACES fees in the forecasted test
3	period. Addr	ess the following:
4	a.	Provide the ACES fees paid by Big Rivers in actual FY 2011, actual FY
5		2012, base period (provide actual and forecasted amounts separately) in this
6		rate case CN 00199 and the prior rate case CN 00535, the forecasted test
7		period in this rate case and the prior rate case. Show amounts by account
8		number and description of the type of services provided by ACES.
9	b.	Regarding (a) above, explain the reasons for the change in ACES fees for
10		the various periods identified and provide copies of related supporting
11		documents and calculations, including copies of contracts. Explain how the
12		suite of support services such as energy risk management, portfolio
13		modeling, contract administration, and regulatory services (as described at
14		Berry, p. 19, l. 14-16) has changed from the 2011 period through the
15		forecasted test period and quantify the impact of each service provided for
16		each year.

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	<i>c</i> .	Regarding (a) and (b) above, explain how Big Rivers has forecasted these
2		costs and provide copies of quotes from ACES and other supporting
3		documentation for each type of service to be obtained from ACES.
4	d.	Regarding (a) and (b) above, explain if Big Rivers has competitively bid
5		these services with other vendors or explain why this is not feasible.
6	e.	Regarding (a) and (b) above, explain if the services from ACES are reflected
7		at the "lower of cost or market" and provide all supporting documentation
8		and calculations for this determination (especially since ACES is a related
9		party and Big Rivers has a vested interest in ACES). Otherwise, explain
10		why the costs of services provided by ACES are determined to be prudent
11		and reasonable.
12	f.	Regarding (a) and (b), provide the date when each related service with
13		ACES will begin (or when it started), explain why it is necessary for Big
14		Rivers to purchase these new services from ACES when the services were
15		not required in the past, and provide copies of all cost versus benefit
16		analysis prepared by Big Rivers in regard to these ACES services.
17		

Case No. 2013-00199 Response to AG 1-126 Witness: Robert W. Berry Page 2 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Response)	
2	a.	Please see attached worksheet.
3	b.	ACES provides a suite of services to its Member-owners. Big Rivers is able
4		to utilize the ACES services provided, as needed, to successfully operate our
5		business. ACES fees are shared among its Members based on a ratio share of
6		total sales. Attached please find a copy of ACES Bilateral Agreement with
7		Big Rivers. This agreement identifies the services provided by ACES, and it
8		is provided pursuant to a petition for confidential treatment.
9	c.	Big Rivers forecasted the 2014 ACES fees assuming a 3% escalation over the
10		expected 2013 fee.
11	d.	Big Rivers has not solicited competitive bids as it relates to the services
12		provided by ACES. We are not aware of any other companies that provide the
13		breadth of services that ACES provides. As a result, we do not have a
14		comparable entity with which to discuss providing all of these services. In
15		other words, our ownership of ACES provides us access to a suite of services
16		that, collectively, are not available from any other single entity. ACES service
17		offerings are unique in that they act as our agent and they do not realize any
18		economic gain or loss as a result of the services they provide to us. Because of

Case No. 2013-00199 Response to AG 1-126 Witness: Robert W. Berry Page 3 of 4

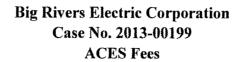
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		this agency relationship, and our ability to direct the company's actions due to
2		our ownership, our interests are aligned with ACES' interests. As an owner of
3		ACES, they are providing us services at their cost. Because ACES provides
4		services to a significant number of similar entities, including 20 other owners,
5		they have created a substantial advantage of economies of scale. The
6		economies of scale they enjoy allow their costs to be lower than that of any
7		other entities that might provide these services, and thus ACES services at
8		cost are lower than market.
9	e.	See Big Rivers' response to subpart (d), above.
LO	f.	Big Rivers has been receiving services from ACES for more than 10 years.
l1		The services provided by ACES are integral to Big Rivers' business. Big
L 2		Rivers has chosen to utilize ACES' services in lieu of having staff on hand to
l3		provide a number of services which are required to operate our business.
L4		Please see the attached Bilateral Agreement for a description of these services.
.5		
.6	Witness)	Robert W. Berry

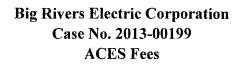
Case No. 2013-00199 Response to AG 1-126 Witness: Robert W. Berry Page 4 of 4



			ALC	CAN - CN 00199		CENTURY - CN 00535				
	2011 2012 Actual Actual		Oct, 2012 - Mar, 2013 Base Period Actual	Apr,2013-Sep,2013 Base Period Forecasted	Forecasted Test Period	May, 2012 - Oct, 2012 Base Period Actual	Nov, 2012 - Apr, 2013 Base Period Forecasted	e Period Forecasted		
55711000	2,003,132	2,025,875	1,069,083	1,099,998	2,271,665	1,047,345	1,082,498	2,244,000		

re No. 2013-00199 nchment to Response for AG 1-126(a) ness: Lindsay N. Barron

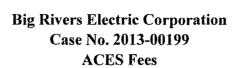
1 of 3



CN 00199 55711000-0	Alcan Rate C		UPPLY-ARB	ITRAGE									
ACES FEES	2013 Jan	2013 Feb	2013 Mar	2013 Apr 183,333	base 2013 May 183,333	base 2013 Jun 183,333	base 2013 Jul 183,333	base 2013 Aug 183,333	base 2013 Sep 183,333	2013 Oct	2013 Nov	2013 Dec	2013 YearTotal 1,099,998
ACES FEES	2014 Jan	ftp 2014 Feb 188,833	ftp 2014 Mar 188,833	ftp 2014 Apr 188,833	ftp 2014 May 188,833	ftp 2014 Jun 188,833	ftp 2014 Jul 188,833	ftp 2014 Aug 188,833	ftp 2014 Sep 188,833	ftp 2014 Oct 188,833	ftp 2014 Nov 188,833	ftp 2014 Dec 188,837	2014 YearTotal 2,077,167
ACES FEES	ftp 2015 Jan 194,498	2015 Feb	2015 Mar	2015 Apr	2015 May	2015 Jun	2015 Jul	2015 Aug	2015 Sep	2015 Oct	2015 Nov	2015 Dec	2015 YearTotal 194,498

BASE1,099,998Apr, 2013 - Sep, 2013FTP2,271,665Feb, 2014 - Jan, 2015

'ase No. 2013-00199 ttachment to Response for AG 1-126(a) itness: Lindsay N. Barron 3e 2 of 3



CN 00535		Century Ra	ite Case										
55711000-O	55711000-OTHER EXPENSE-POWER SUPPLY-ARBITRAGE												
											base	base	
	2012	2012	2012	2012	2012	2012	2012	2012	2012	2012	2012	2012	2012
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YearTotal
ACES FEES											174,583	174,583	349,166
			,						۸.	<i>5</i> .	r .	5 .	
	base	base	base	base					ftp	ftp	ftp	ftp	
	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2014
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YearTotal
ACES FEES	183,333	183,333	183,333	183,333					183,333	183,333	183,333	183,337	1,466,668
	ftp	ftp	ftp	ftp	ftp	ftp	ftp	ftp					
	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YearTotal
ACES FEES	188,833	188,833	188,833	188,833	188,833	188,833	188,833	188,833	004	•••	1100	200	1,510,664
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		200,000	200,000	200,033	100,033	200,000	100,000	200,033					1,310,004

BASE1,082,498Nov, 2012 - Apr, 2013FTP2,244,000Sep, 2013 - Aug, 2014

'e No. 2013-00199 chment to Response for AG 1-126(a) tess: Lindsay N. Barron

3 of 3

CONFIDENTIAL ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 127)	Please refer to Crockett Direct beginning at page 5, line 18: Provide detail	
2	on the Engineering supervision cost estimates on each line and substation construction		
3	project identified on the latest Big Rivers three-year construction plan. Information		
4	should include final spreadsheets, project descriptions, etc. in electronic format compatible		
5	with Microso	ft Office programs.	
6			
7	Response)	A copy of the final spreadsheet prepared by the Engineering supervision for	
8	inclusion in the 2013 Capital Budget and the 2014 Financial Plan are provided as attachments		
9	to this response.		
10			
11	Witness)	David G. Crockett	

Case No. 2013-00199 Response to AG 1-127 Witness: David G. Crockett Page 1 of 1

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 128)	Please refer to Crockett Direct at page 5, line 18: Provide any changes to	
2	the Engineering supervision cost estimates on each line and substation construction		
3	project identified on the latest Big Rivers three-year construction plan from		
4	implementation of the Load Concentration Mitigation plan.		
5			
6	Response)	No changes to the Engineering supervision cost estimates on line and	
7	substation construction projects have been made as a result of the implementation of the		
8	Load Concentration Mitigation plan.		
9			

10 Witness) David G. Crockett

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 129)	Please refer to Crockett Direct beginning at page 8, line 3: Provide system	
2	drawings and	diagrams depicting Big Rivers' transmission facilities, their interties to other	
3	transmission owners, as well as depicting phase 1 and phase 2 transmission projects.		
4	Information may be provided in accessible viewable electronic format (PDF, etc.).		
5			
6	Response)	Please see the attached CONFIDENTIAL electronic file(s) containing a copy	
7	of Big Rivers'	system map, provided under a petition for confidential treatment. It includes	
8	all Big Rivers	' transmission facilities, interties, and the phase 1 and 2 transmission projects.	
۵			

10 Witness) David G. Crockett

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 130)	Please refer to Crockett Direct beginning at page 8, line 3: Provide any	
2	changes to sy	estem drawings and diagrams depicting Big Rivers' transmission facilities,	
3	their interties to other transmission owners, as well as depicting phase 1 and phase 2		
4	transmission projects from implementation of the Load Concentration Mitigation plan.		
5			
6	Response)	No changes to Big Rivers' system drawings and diagrams have been made as	
7	a result of the	implementation of the Load Concentration Mitigation plan.	
8			
q	Witness)	David G. Crockett	

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

- 1 Item 131) Please refer to Crockett Direct beginning at page 8, line 3: Provide system
 2 drawings and diagrams depicting regional transmission facilities to which Big Rivers is
 3 interconnected (overview of interconnected MISO and TVA systems, etc.). Information
 4 may be provided in accessible viewable electronic format (PDF, etc.).
 5
 6 Response) Please see response to AG 1-129.
- 8 Witness) David G. Crockett

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 132)	Please refer to Crockett Direct beginning at page 8, line 3: Provide cost
2	detail of phas	e 2 transmission project. Information should include final spreadsheets,
3	project descri	ptions, etc. in electronic format compatible with Microsoft Office programs.
4		
5	Response)	The phase 2 new transmission line project's final cost information is provided
6	as an electroni	ic attachment to this response.
7		

8 Witness) David G. Crockett

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- 1 Item 133) Please refer to Crockett Direct beginning at page 8, line 3: Provide any
- 2 changes to cost detail of phase 2 transmission project from implementation of the Load
- 3 Concentration Mitigation plan.

4

- 5 **Response**) No changes to the cost of the phase 2 transmission project have been made as
- 6 a result of the implementation of the Load Concentration Mitigation plan.

7

8 Witness) David G. Crockett

Case No. 2013-00199 Response to AG 1-133 Witness: David G. Crockett Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

Please provide copies of all reports, spreadsheets, etc. provided as part of the Item 134) 1 MISO assessment of transfer capability from the Big Rivers transmission zone into other 2 MISO zones and TVA. 3 4 A redacted version of the MISO Assessment report is provided in response to Response) 5 PSC 2-13. 6 7 David G. Crockett

Witness)

Case No. 2013-00199 Response to AG 1-134 Witness: David G. Crockett Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 135)	Mr. Crocket's testimony addresses the forecast of capital plant and
2	forecasted pla	ant for 2013 through 2016, along with 13-month average plant (and rate base
3	components)	, provided at various tabs/documents included in this rate case including (but
4	not limited to) Tab 22 (pages 1 to 36), Tab 26 (pages 1 and 2), Tab 27 (page 1 of 1), Tab 28,
5	Attachment 1	(pages 9 to 27), Tab 45 (pages 1 to 8), Exhibit Berry 2 (pages 1 to 15),
6	Exhibit Warı	en-2 (pages 3 to 18), Exhibit Wolfram-3 (pages 1 to 14). Address the
7	following.	
8	<i>a</i> .	Because this rate case is not a typical revenue requirement calculated using
9		rate-of-return on rate base regulation, but is instead a revenue requirement
10		based on a TIER calculation then explain all reasons why Big Rivers
11		provides the forecasted capital budget and 13-month averages for rate base
12		components in this rate case (besides this being a requirement of Kentucky
13		Administrative Regulations) and explain why this is important to Big
14		Rivers' rate case and how it impacts the rate case and related revenue
15		requirement.
16	<i>b</i> .	Explain how the forecasted capital plant budget should be used to show that
17		Big Rivers is, or is not, providing safe, low-cost, and reliable service to its
18		customers (Mr. Crocket testimony, p. 7, l. 11-16).

Case No. 2013-00199 Response to AG 1-135 Witnesses: John Wolfram, David G. Crockett, Jeffrey R. Williams Page 1 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1	c.	Explain if, and how, the forecasted capital plant budget is used to calculate
2		other expenses or costs included in this rate case for the base period (show
3		actual and forecasted amount separately), forecasted test period, and the
4		forecasted periods 2015 and 2016, and show all amounts by account
5		number and account description. Cite to all calculations in the Financial
6		Model, and provide all supporting documentation and calculations.
7	d.	Regarding (c) and (d) above, as an example, explain if forecasted capital
8		plant is used to calculate other costs or other assumptions included in the
9		revenue requirement, such as fixed department expense for transmission
10		(Crocket, page 6, l. 3-19), depreciation expense, accumulated depreciation,
11		accumulated deferred income taxes, interest expense, AFUDC, the percent
12		of labor split between expensed and capitalized, the amount of Wilson and
13		Coleman that is idled, the impact of the loss of Alcan, and all other costs
14		and assumptions. Provide all applicable information requested in (c) above
15		for all cost components and assumptions in this rate case.
16		
17	Response)	

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	a.	Big Rivers objects to the mischaracterization that "this rate case is not a
2		typical revenue requirement." Notwithstanding this objection, and without
3		waiving it, Big Rivers responds as follows. Big Rivers submits that the use of
4		a TIER calculation is the typical approach used for electric cooperative rate
5		regulation. Big Rivers provides the forecasted capital budget and thirteen-
6		month averages for rate base components in order to comply with 807 KAR
7		5:001 Section 16. Other data provided but not required by the regulation is
8		provided in that same format to maintain consistency. It is important for Big
9		Rivers to comply with the applicable regulations. The data impacts the rate
10		case to the extent that providing this information in a format with which the
11		Commission and other parties are familiar may facilitate their review and
12		assessment of the information provided.
13	b.	The transmission projects included in the forecasted capital plant budget are
14		taken from Rural Utilities Service ("RUS") approved three year transmission
15		system construction work plans. The construction work plans identified
16		transmission system improvements required to continue to allow Big Rivers to
17		provide safe, low cost, and reliable service to its' Member systems. The
18		planning criteria on which the construction work plan studies are based were

Case No. 2013-00199 Response to AG 1-135 Witnesses: John Wolfram, David G. Crockett, Jeffrey R. Williams Page 3 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1

2

3

4

5

6

8

9

10

11

12

13

14

15

16

17

18

	developed to meet RUS requirements, National Electric Safety Code
	requirements, and NERC standards. The planning criteria define that all
	transmission lines and transformers are to be operated within their ratings and
	all system voltages are to be maintained at acceptable levels under normal and
	single-contingency outage conditions. Thus, the current construction work
	plan included the development of a list of capital construction projects
	necessary to eliminate unacceptable voltages and equipment loading problems
	identified in the study process by using the least cost solution available to Big
	Rivers is thus able to continue on an on-going basis to fulfill its service
	obligations to its Members in a safe, low-cost, and reliable manner.
c.	Big Rivers objects that this request is overly broad and unduly burdensome.
	Notwithstanding this objection, and without waiving it, Big Rivers responds
	as follows. The forecasted capital plant budget is used to calculate
	depreciation expense. Please see the attached electronic files for the
	calculation of depreciation expense for years 2013-2016. Also, please see the
	attached electronic schedule for depreciation by account for the periods
	requested. The depreciation expense is included in the Financial Model on the
	Capex and Depreciation sheet.

Case No. 2013-00199 Response to AG 1-135 Witnesses: John Wolfram, David G. Crockett, Jeffrey R. Williams Page 4 of 5

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	d.	The forecasted capital plant budget is not used to calculate any expenses other
2		than depreciation expense.
3		
4	Witnesses)	John Wolfram (part a)
5		David G. Crockett (part b)
6		Jeffrey R. Williams (part c and d)

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 136)	Provide Exhibit Barron-3 in electronic format. Spreadsheet should include
2	all related for	mulas and other worksheets linked to cells printed in the Exhibit in an
3	electronic for	mat compatible with Microsoft Office programs.
4		
5	Response)	Please see the attached electronic file titled "AG 1-136 Elec. Att. Exhibit
6	Barron-3 - De	mand Energy Budget 2014-2015 (Barron 082313).xlsx."
7		

8 **Witness)** Lindsay N. Barron

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 137)	Please refer to Exhibit Barron 3: Provide Actual 2010, 2011, 2012 and	
2	2013 YTD Bit	lling Demands and Energy on a monthly basis for comparison to Exhibit	
3	Barron-3, in	electronic format. Spreadsheet should include all related formulas and othe	
4	worksheets linked to cells printed in the Exhibit in an electronic format compatible with		
5	Microsoft Off	ice programs.	
6			
7	Response)	Please see attached the electronic file(s) containing the 2010-2012	
8	spreadsheets.		
9			
10	Witness)	Lindsay N. Barron	

Case No. 2013-00199 Response to AG 1-137 Witness: Lindsay N. Barron Page 1 of 1

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 138)	Reference the Wolfram testimony at pp. 38-39. Please produce copies of any
2	and all comm	nunications regarding the cost impact estimates between Big Rivers, its
3	consultants o	and its member-owners.
4		
5	Response)	Please see the response to AG 1-158.
6		
7	Witness)	Billie J. Richert

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 139)	Please provide the latest load forecast (and associated documentation and
2	workpapers)	performed by outside consultants for Big Rivers, and identify any and all
3	such outside	consultants. Please provide this information in Excel spreadsheets with all
4	formulae inte	act.
5		
6	Response)	The requested information is provided under petition for confidential
7	treatment in r	nultiple files in the folder "AG-1-139 Elec. Atts. (CONFIDENTIAL)
8	(Barron08231	(3)," which is contained in the electronic files accompanying these responses.
9	The file "Moo	del Tables.XLSX" contains the forecast tables that are presented in Appendix B
LO	of the 2013 L	oad Forecast report.
l1	Big Rivers co	entracted with GDS Associates, Inc. to prepare the 2013 Load Forecast, which
L2	was complete	ed in April 2013.
13		
L4	Witness)	Lindsay N. Barron

Case No. 2013-00199 Response to AG 1-139 Witness: Lindsay N. Barron Page 1 of 1

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 140)	Please provide the latest load forecast documentation submitted to RUS for
2	RUS approval.	
3		
4	Response)	Please see the electronic file labeled "2013 Load Forecast_BigRivers_04-17-
5	13.pdf' provided in response to AG 1-139.	
6		
7	Witness)	Lindsay N. Barron

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

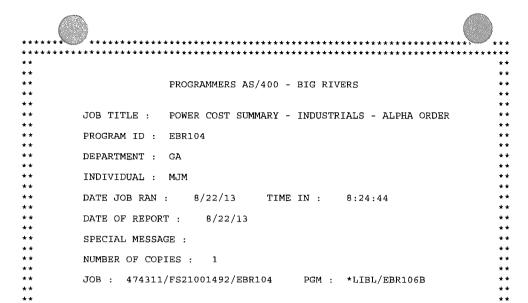
1	Item 141)	Please provide coincident peak demands on a monthly basis for the rurals,
2	large industr	ials, and each smelter for the years 2010, 2011, 2012 and 2013, as well as the
3	hour and date of each coincident peak.	
4		
5	Response)	Please see the confidential documents provided in Case No. 2012-00535 in
6	response to A	G 1-156 as well as the documents attached hereto.
7		

Witness)

Lindsay N. Barron

Case No. 2013-00199 Response to AG 1-141 Witness: Lindsay N. Barron

Page 1 of 1



Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 1 of 18

Big Rivers Electricorporation Case No. 2013-00199 Attachment for Response to AG 1-141



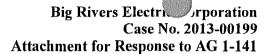
BIG RIVERS ELECTRIC CORPORATION

PAGE 1 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH USED			MILLS PER KWH	POWER FACTOR BASE PEAK AVE.	MONTH
						TO	TAL LINE					
		CH	ARGE		FUEL ADJ	ENVIR.SURC	HARGE	P/F PENA	LTY		TOTAL COST	
ACCURIDE (CORPORATIO	N										088 KE*
					4,891	4,891	2,067,620				90.00% 98.00% 78.00%	
					4,876		1,846,120				90.00% 97.00% 77.00%	
					5,035 5,216	5,035 5,216	2,008,880				90.00% 96.00% 77.00% 90.00% 96.00% 84.00%	
					5,080	5,080	2,218,670 2,361,538				90.00% 97.00% 84.00%	
					5,065	5,065	2,031,670				90.00% 96.00% 79.00%	
	94907500	97148760	11:30	7/18	5,322		2,241,260				90.00% 96.00% 83.00%	
YEAR TO					5,322	5,322	14,775,758		54.57	52.83		
CURRENT		109,67	2.23		6.983.77	6.0	22.46		.00		119,637.07	
					NSNFPPA:	2,3	33.15- NSNF	PPA2:	7	08.24~		
YEAR TO	DATE	722,96	1.16		6,983.77 NSNFPPA: 48,759.90	39,6	22.51				780,580.45	
					NSNFPPA:	15.3	81.56- NSNF	PPA2:	15.3	81.56-		
ALCOA, INC	C PO 19	0035471				,-			,			192 KE*
					194	194	119,180				90.00% 57.00% 50.00%	
					184	184		78.06			90.00% 53.00% 47.00%	
					169	169	97,030				90.00% 50.00% 45.00%	
					176	176	87,150	68.62	68.77		90.00% 40.00% 41.00%	
					139	139	82,950 79,050	04 01	80.21		90.00% 39.00% 40.00% 90.00% 40.00% 40.00%	
	10170990	10251380	4:00	7/01	116	116	80,390	93 31	93 15		90.00% 40.00% 40.00%	
YEAR TO	DATE					176 139 116 116 194				63.87	30.000 10.000 33.000	, ,,
CURRENT		3,27	6.91		250.50 NSNFPPA: 2,097.95	1	74.75	1,522	1.50		5,115.57	
VEND #10	D.3.000				NSNFPPA:		83.69~ NSNF			25.40~		
YEAR TO	DATE	27,56	7.86		2,097.95	1,4	79.68	11,203	.50		41,012.01	
					NSNFPPA:	6	68.49- NSNF	PPA2:	6	68.49-		
ALERIS ROI	LLED PRODU	CTS, INC.										100 KE*
					28,180	28,180	14,864,040				90.00% 88.00% 88.00%	
					27,594	27,594	14,142,520		76.27		90.00% 94.00% 90.00%	
					28,690	28,690	16,101,490				90.00% 83.00% 90.00%	
					27,537 27,367	27,537	13,736,690 15,787,060				90.00% 93.00% 94.00% 90.00% 82.00% 87.00%	
					27,367	27.084	15,787,060				90.00% 82.00% 87.00%	
1	107584240	122866650	2:00	7/08	28,010	28,010	15,282,410				90.00% 95.00% 91.00%	
YEAR TO					28,690	27,337 27,367 27,084 28,010 28,690	105,311,650			38.71		. •
CURRENT		539,14	4.17		47,619.99 NSNFPPA:	36,5	02.90		.00		602,528.83	
YEAR TO	DATE	3 607 20	7 00	7	NSNFPPA: 48,510.95	15,9	08.99- NSNF! 63.36	PPA2:	4,8	29.24-	4 077 027 72	
TEAR TO	DAIE	3,031,20	1.00	3	±0,310.95	250,5	03.36		.00		4,077,023.33	
					NSNFPPA:	109,6	29.43- NSNF	PPA2:	109,6	29.43-		

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 2 of 18



BIG RIVERS ELECTRIC CORPORATION

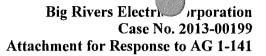
PAGE 2 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ TIME		KW DEMAND ACTUAL				F.% BILLED		POWER FACTOR BASE PEAK AVE.	монтн
		CHARGE		FUEL ADJ						TOTAL COST	
		CHARGE		FUEL ADO	ENVIR. SURCE	ARGE I	F/F PENF	mii		TOTAL COST	
AMG ALUMI	NUM NORTH	AMERICA, LLC									066 KE*
				1,953	2,001	824,030	56.72	55.35	47.56	90.00% 95.00% 93.00	% 01
				1,903	2,001	735,920	57.55	54.73		90.00% 89.00% 91.00	
				2,145	2,145	779,570	48.92	48.91		90.00% 96.00% 91.00	
				2,032	2,032	647,150	44.22	44.23		90.00% 92.00% 90.00	
				1,856	2,001	612,910	44.40	41.17		90.00% 84.00% 89.00	
			- (1,918	2,001	605,350	43.83	42.02		90.00% 89.00% 90.00	
WELD #0		56163510 9:00	7/09	1,994	2,001	643,660	43.40	43.24		90.00% 86.00% 89.00	% 07
YEAR TO				2,145	2,001 2,001 2,145 2,032 2,001 2,001 2,001 2,145	4,848,590	44.43	44.43	58.00		
CURRENT		36,135.85 260,092.68		2,005.64	1,99	0.00	903	3.00		40,161.04	
				NSNFPPA:	67	0.05- NSNF	PA2:	2	03.40-		
YEAR TO	DATE	260,092.68		15,913.60	14,38	9.49	903	3.00		281,204.01	
3.514.5555.014.5	D			NSNFPPA:	5,04	7.38- NSNF	PPA2:	5,0	47.38-		
ARMSTRONG	- DOCK										212 KE*
				8,669	8,669 9,072 10,080	3,790,160				90.00% 94.00% 96.00	
				9,072 10,080	10,080	3,628,780 4,411,280				90.00% 94.00% 96.00 90.00% 92.00% 95.00	
				9,639	10,080	3,887,410				90.00% 92.00% 93.00	
				9,293	9 293	3,919,200	56.69	56.61		90.00% 92.00% 94.00	
				9,173	9.173	3,621,720				90.00% 94.00% 94.00	
	94141830	97794720 17:00	7/18	9,419	9,419	3,652,890	52.13	52.13		90.00% 96.00% 94.00	
YEAR TO	DATE			10,080	9,639 9,293 9,173 9,419 10,080	26,911,440			54.33		
CURRENT		192,461.67		11,382.41	10,22	6.17		.00		209,113.28	
				NSNFPPA:	3,80	2.66- NSNF	PPA2:	1,1	54.31-		
YEAR TO	DATE	1,356,542.63		89,082.29	72,49	6.57		.00		1,462,091.87	
NDMCTDONG.	- EOUALIT	137		NSNFPPA:	28,01	4.81- NSNFE	PPA2:	28,0	14.81-		
ARMS I RUNG	- EQUALII	I		3 200	3 200	1 557 400	CF 41	CF 43	45 04	00 00% 00 00% 03 00	215 KE*
				3,200 3,137	3,200 3,137	1,557,400 1,391,500				90.00% 96.00% 93.00 90.00% 95.00% 93.00	
				3,137		1,552,800				90.00% 95.00% 93.00	
				3,251		1,507,800				90.00% 95.00% 92.00	
				3,087		1,438,810				90.00% 96.00% 91.00	
				3,156		1,446,710				90.00% 94.00% 92.00	
		46776630 21:30	7/10	3,081		1,414,740			48.47		
YEAR TO	DATE		•	3,251	3,251	10,309,760			51.15		-
CURRENT		68,723.18		4,408.33	3.64	8.12		.00		74,859.83	
		- /		NSNFPPA:	1.47	2.74- NSNF	PPA2:		47.06-	. 1,000.00	
YEAR TO	DATE	68,723.18 488,720.90		33,986.76	26,11	9.27	-	.00		527,362.03	
				NSNFPPA:	10,73	2.45- NSNF	PPA2:	10,7	32.45-		

Case No. 2013-00199, Attachment for Response to AG 1-141

Witness: Lindsay N. Barron, Page 3 of 18



BIG RIVERS ELECTRIC CORPORATION

PAGE 3 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER	READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH US	ED ACTU		. MILLS D PER KWH	POWER FACTOR BASE PEAK AVE.	MONTH
		CH	ARGE		FUEL ADJ	ENVIR.SURCE	TAL LINE. HARGE	P/F P	ENALTY		TOTAL COST	
ARMSTRONG	- LEWIS C	REEK										217 KE*
					1,178	1,178			52 56.5		90.00% 70.00% 76.00%	
					1,222 1,329	1,222 1,329 1,481 3,500 3,500	485,	/20 59.	14 59.1	5 51.28	90.00% 98.00% 87.00% 90.00% 95.00% 95.00%	
					1,329	1,329	483,	260 48. 210 56	93 48.9	4 55.35	90.00% 95.00% 95.00%	
					2,098	3.500	665	400 42.	63 25.5	5 79.50	90.00% 87.00% 91.00%	
					2,249	3,500	741,	160 45.	79 29.4	2 74.40		
	9258220	10110910	14:00	7/31	2,268	3,500	852,	590 50.	53 32.7	5 68.86	90.00% 88.00% 90.00%	
YEAR TO	DATE				2,268	1,481 3,500 3,500 3,500 3,500	4,323,	170 37.	46 24.2	8 69.61		
CURRENT		E0 E0:	2 07								64 107 16	
		59,50.	3.07		2,656.98 NSNFPPA:	3,10	14.20 17.65- N	SMEDDA2.		269.45-		
YEAR TO	DATE	277,58	5.14		14,307.37	14,48	38.58	3,	538.50	207.45-		
ARMSTRONG	MIDWAY				NSNFPPA:	4,50	00.41- N	SNFPPA2:	4	,500.41-		211 KE*
ARMSTRONG	- PIIDWAI				4,870	4,870	2 549	130 70	36 70.3	6 42 04	90.00% 94.00% 91.00%	
					E 077	E 077	2 525		61 74.6		90.00% 93.00% 92.00%	
					5,049	5,049	2 694		82 71.8		90.00% 94.00% 91.00%	
					5,002	5,002	2,513.		79 69.7		90.00% 93.00% 89.00%	
					4,750	4.750	2,440.				90.00% 93.00% 87.00%	
					4,716	4,716	2,440,1 2,436,	780 71.	77 71.7	6 42.31	90.00% 90.00% 86.00%	
	8347420	10651600	21:00	7/15	4,649	4,649	2,304,	L80 66.	61 66.6	2 44.18	90.00% 90.00% 88.00%	
YEAR TO	DATE				5,049	5,037 5,039 5,002 4,750 4,716 4,649 5,049	17,463,		98 67.9			
CURRENT		101,34	1.28		7,179.82				.00		111,132.66	
					NSNFPPA:	2,39	8.65- N			728.12-	,	
YEAR TO	DATE	748,38	1.32		57,713.68	2,39 42,56	3.21		.00		812,298.71	
					NSNFPPA:	18,17	10 7E N	enedda 2.	10	170 75-		
DOMTAR PA	PER CO LLC	•			NUMPER.	*** KMH 116EL	יאַר ייביייני	DE KWH	* 03.1.118	, _ ; J . / ⊃ " * *		108 KE*
					64,498	*** KWH USEL 15,000	29,429,	310	DILLE			01
					49,507		25,146,					02
					46,116		28,807,					03
					56,074		28,751,					04
					69,466		30,132,	340				05
					69,012		31,256,					06
		188493200	3:00	7/11	68,429	35,000	32,956,					07
YEAR TO	DATE				69,466	35,000	206,480,	280				
CURRENT		1,052,21	8.71		80,756.99	55.01	5.00		. 00		1,152,821.50	
					NSNFPPA:	26,97	9.47- N	SNFPPA2:	B	,189.73-	_,,	
YEAR TO	DATE	6,937,034	4.03		01,668.12	254,80	1.39		.00	,	7,343,236.08	
					NSNFPPA:	105 10	2 72 37	TATE OF THE	105	122 42		
					NONFFPA:	125,13	3.73- N	ONF PPAZ:	125	, 133./3-		

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 4 of 18

Big Rivers Electric rporation Case No. 2013-00199 Attachment for Response to AG 1-141

EBR106B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

PAGE 4 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH USED	L.F ACTUAL	'.% BILLED	MILLS PER KWH	POWER FACTOR BASE PEAK AVE.	MONTH
											TOTAL COST	
DOTIKI #3	- WEBSTER	COUNTY CO.	AL CO.		187	187	77 850	55 90	55 96	48 98	90.00% 88.00% 77.00% 90.00% 83.00% 71.00% 90.00% 89.00% 67.00% 90.00% 84.00% 75.00% 90.00% 83.00% 73.00% 90.00% 80.00% 72.00%	188 KE*
					177	177	36,730	30.85	30.88	79.55	90.00% 83.00% 71.00%	k 02
					94	94	35,800	51.48	51.26	52.42	90.00% 89.00% 67.00%	k 03
					181	181	83,200	63.70	63.84	47.68	90.00% 84.00% 75.00	6 04
					173	173	70,630	54.94	54.87	50.92	90.00% 83.00% 73.00%	05
	40750050	40000010		7/10	193	193	77,040	55.44	55.44	52.46	90.00% 81.00% 74.00	b 06 b 07
YEAR TO	40/50850	40829310	14:00	//18	189	189	/8,460	16 91	55.80	52.//	90.00% 80.00% 72.00	6 07
					193	193	459,710	40.01	40.01	34.32		
CURRENT		3.66	2.55		244.48	21	2.31	252	.00		4,264.87	
		.,			NSNFPPA:	8	1.68- NSNFE	PPA2:		24.79-	,	
YEAR TO	DATE	22,21	6.39		244.48 NSNFPPA: 1,492.78	1,28	7.12	934	.50		24,973.65	
					NSNFPPA:	47	8.57~ NSNFE	PPA2:	4	78.57-		
ELK CREEK	MINE - HO	PKINS CO C	DAL								00 000 40 000 35 000	218 KE* 1 01
					139	750	36,540	35.44	6.55	240.19	90.00% 48.00% 35.00° 90.00% 46.00% 48.00°	t 01 k 02
					208	750 750	73 250	מע./נ בר בר	10.53	170.10	90.00% 46.00% 46.00	b 02
					737	750	173 670	33.33	32 16	71 43	90 00% 82 00% 68 00%	k 04
					554	750	402.050	97.47	72.05	41.77	90.00% 82.00% 82.00%	k 05
					617	750	388,850	87.47	72.01	42.45	90.00% 80.00% 82.00%	b 06
	1132210	1535080	30	7/15	554	750	402,870	97.67	72.20	42.73	90.00% 82.00% 82.00%	§ 07
YEAR TO	DATE				737	750	1,530,410	40.81	40.11	62.63	90.00% 46.00% 48.00% 90.00% 55.00% 49.00% 90.00% 82.00% 68.00% 90.00% 82.00% 82.00% 90.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00% 82.00%	
CURRENT		16,57	2.11		1,255.34	96	8.67		.00		18,249.42 95,848.40	
					NSNFPPA:	41	9.39- NSNF	PA2:	1	27.31-	05 040 40	
YEAR TO	DATE	88,27	0.22		5,182.07	4,96	2.93	619	.50		95,848.40	
HODWING G	0 0031 11	a			NSNFPPA:	1,59	3.16- NSNF	PPA2:	1,5	93.16-		091 KE*
HOPKINS CO	O COAL, LL	C.			416	416	170 540	EE 12	EE 10	40 14	90.00% 99.00% 94.00%	0.7
					422	416	170,540	61 18	61 21	48.14	90.00% 99.00% 94.00%	b 02
					416	416	177.620	57.49	57.47	47.10	90.00% 97.00% 93.00%	t 03
					416	416	171,440	57.27	57.24	48.01	90.00% 99.00% 93.00	t 04
					378	378	142,398	50.63	50.63	50.52	90.00% 95.00% 90.00%	k 05
					365 95 422	365	108,060	41.07	41.12	58.34	90.00% 95.00% 85.00%	₹ 06
	15552110	15602710	10:30	7/08	95	100	50,600	71.89	68.01	45.70	90.00%100.00% 80.00	₹ 07
											90.00% 97.00% 94.00% 90.00% 97.00% 93.00% 90.00% 93.00% 90.00% 90.00% 90.00% 90.00% 95.00% 85.00% 90.00% 100.00% 80.00%	
CURRENT		2,23	7.06		157.67 NSNFPPA: 3,284.85	12	4.86		.00		2,450.93	
					NSNFPPA:	5	2.67- NSNF	PPA2:		15.99-		
YEAR TO	DATE	47,94	6.14		3,284.85	2,73	3.23		.00		51,894.24	
					NSNFPPA:	1,03	4.99- NSNF	PPA2:	1,0	34.99~		



BIG RIVERS ELECTRIC CORPORATION

PAGE 5 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ PRESENT			.KW DEMAND ACTUAL				L.F ACTUAL		MILLS PER KWH		WER FACT		монтн
							TAL LIN	E							
			ARGE		FUEL ADJ	ENVIR.SURC			P/F PENA			7	TOTAL CO	OST	
															100 11-1
KIMBERLY-	CLARK CORP	ORATION			37,886	37,886	26 93	0 250	95.54	95 54	33.91	90.00%	91.00%	92.00%	120 KE* 01
					37,714	37,714		1,120		94.74		90.00%			02
					38,059	38,059	26,69	9,800	94.42	94.42		90.00%			03
					38,059	38,059			92.53			90.00%			04 05
					37,800 38,189	37,800			85.03 95.83			90.00% 90.00%			06
	49664230	75366930	7.30	7/04	38,578	38 578			89.55			90.00%			07
YEAR TO		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, , , ,	.,	38,578	37,800 38,189 38,578 38,578			91.18		34.92				
CURRENT		821,19	2.08		80,089.61	56,6 26,7	591.45			.00		:	923,094	. 58	
					NSNFPPA:	26,7	756.51-	NSNFI	PPA2:		22.05-				
YEAR TO	DATE	5,640,93	9.89	5	89,836.39	391,0	065.86			.00		6,2	249,237	.44	
D		a n'			NSNFPPA:	186,3	302.35-	NSNFI	PPA2:	186,3	02.35-				219 KE*
Pennyrile	Energy, LL		e Mine 11:00		277	290		2,690	1 30	1 25	1,559.00	90.00%	65.00%	34.00%	
YEAR TO	DATE	2000	11.00	1,30	277	290 290			1.31		702.12		•		
CURRENT	ı	3,42	3.44		8.38 NSNFPPA:	1	163.52 2.80- 163.52		987	7.00			4,578	.69	
						_	2.80-	NSNF	PPA2:		.85-		4 570	CO	
YEAR TO	DATE	3,42	5.39		8.38]	163.52		98	.00			4,578	.69	
					Mana		2 22	MONTO	222		2.80-				
PATRIOT C	ONT. T.D				NSNFPPA:		2.80-	NSWF	PPAZ:		2.60-				095 KE*
TATRIOT C	OAD DI				1,877	3,300	54	6,110	39.10	22.24	85.57	90.00%	80.00%	35.00%	01
					595	3,300 3,300 3,300	18		45.62	8.23		90.00%	31.00%	15.00%	02
YEAR TO	DATE				1,877	3,300	72	8,640	27.41	15.59	118.92				
CURRENT	•		.00		.00 NSNFPPA:		.00			.00				.00	
					NSNFPPA:			NSNF	PPA2:		.00		06 640	0.7	
YEAR TO	DATE	81,40	18.74		1,993.93	4,	762.62			.00			86,648	. 21	
					NSNFPPA:		758.51-	NCNE	. כ גמם	_	758.51-				
PRECOAT M	ETALS CORP				Nonf PPA:		/56.51-	NSNE	PPAZ:		36.31-				118 KE*
I ILL COIII II	2111				3,576	3,576	1,45	4,100	54.66	54.65	47.83	90.00%	90.00%	84.00%	01
					3,546	3,546	1,33	7,830	56.15	56.14		90.00%			02
					3,568	3,568		4,300		49.95		90.00%			03 04
					3,561 3,523	3,561 3,523		9,250		58.08 54.53		90.00% 90.00%			04 05
					3,523	3,523 3,538		5,870		53.23		90.00%			06
	119935230	121371870	17:30	7/26	3,644	3,644		6,640		52.99	49.65		90.00%		
YEAR TO				•	3,644	3,644		7,240		53.00	49.00				
CURRENT	•	64,81	4.94		4,476.57	3,5	988.56			.00			71,330	.55	
YEAR TO	י די איני די	440,83	1 1 0		NSNFPPA: 32,354.46	1,4	495.54- 113.23	NSNF	PPA2:		153.98-		481,532	35	
IEAR TU	PAID	440,83	4.40		34,334.40	21,.	113.23		1,090				101,332		

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 6 of 18



EBR106B

NSNFPPA:



10,230.16-

Big Rivers Electric Case No. 2013-00199 Attachment for Response to AG 1-141

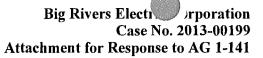
BIG RIVERS ELECTRIC CORPORATION MONTH ENDING 7/31/2013

POWER COST SUMMARY

PAGE DATE 6 8/22/13

SUBSTN					KW DEMAND ACTUAL									MONTH
					FUEL ADJ							TOTAL C		
SEBREE MI	INING-KMMC													098 KE*
ODDINGE III					205	205	94,530	62.04	61.98	48.99	90.00%	79.00%	97.00%	01
					208	208	82,670	59.14	59.14	49.57	90.00%	97.00%	76.00%	02
					198	198		51.22			90.00%			03
					180	180	45,630	35.29	35.21		90.00%			04
					107	107	33,580 34,800	42.10	42.18		90.00%			05
	21112220	31147530	12.20	7/22	117 110	117 110	34,800	41.45	41.31		90.00% 90.00%			06 07
YEAR TO		2114/330	13.30	1/23	208	208	34,800 35,210 401,920	37 98	37 98	59.02	90.00%	90.00%	92.00%	07
								37.30	37.50	33.02				
CURRENT	ľ	2,08	32.50		109.71 NSNFPPA: 1,301.02	10	9.16	10				2,264	.09	
					NSNFPPA:	3	6.65- NSNF			11.13-				
YEAR TO	DATE	21,73	30.34		1,301.02	1,16	7.94	357	.00			23,719	.48	
GDDDDD MT	NITE CORNE	IDOD#			NSNFPPA:	41	8.41- NSNF	PPA2:	4	18.41-				
SEBREE MI	INING-STEAM	IPORT			7 -77	7 [77	3 335 463	F7 30	5 7 30	46 56	00 00%	04 00%	04 008	205 KE*
					7,577 8,127	7,577 8,127	3,235,103 2,984,160	51.39	51.39	46.56 50 57	90.00%	94.00%	84.00% B2 00%	01 02
					7,867	7,867	3,078,044							03
					7 004	7 004	3,153,100							04
					7,839	7,839 7,773 6,466 8,127	2,950,380	50.59	50.59	49.88	90.00%	93.00%	84.00%	05
					7,773	7,773	2,181,320 1,532,800 19,114,907	38.98	38.98	59.41	90.00%	92.00%	74.00%	06
		24860210	13:00	7/15	6,466	6,466	1,532,800	31.86	31.86	67.32	90.00%	97.00%	72.00%	07
YEAR TO								46.23	46.23	56.25				
CURRENT	?	104,28	1.05		4,776.20 NSNFPPA:	5,67	6.22		.00			112,653	.47	
					NSNFPPA:	1,59	5.64- NSNF	PPA2:	4	84.36-		•		
YEAR TO	DATE	996,63	4.03		NSNFPPA: 62,992.12	55,46	1.69		.00		1,0	075,290	.62	
					NSNFPPA:	19,89	8.61- NSNF	PPA2:	19,8	98.61-				
SOUTHWIRE	COMPANY				7 000	7 000	4 224 600	00.06	00.06	20.15	00 000	70 008	77 004	213 KE*
					7,023 6,751	7,023 6,751	4,334,690 3,778,440				90.00% 90.00%			01 02
					6,744	6,744	4,051,860							03
					7 046	7 046	4,119,850				90.00%			04
					7,023	7,023	4,275,050			39.40				05
					7,235	7,235	4,430,780				90.00%			06
		52862400	23:30	7/09	7,545	7,023 7,235 7,545 7,545	4,579,710			40.44	90.00%	76.00%	76.00%	07
YEAR TO	DATE				7,545	7,545	29,570,380	77.03	77.03	41.03				
CURRENT	7	172,21	6.96		14,270.38	10.47	1.15		.00		-	190,743	.82	
		,			14,270.38 NSNFPPA:	4,76	7.48- NSNF			47 19-				
YEAR TO	DATE	1,109,89	4.18		97,434.65	67,55	4.06		.00		1,2	213,317	. 35	
					NSNFPPA:	30,78	2.77- NSNF	PPA2:	30,7	82.77-				

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 7 of 18



BIG RIVERS ELECTRIC CORPORATION

PAGE 7 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER	READ			.KW DEMAND	BILLED	KWH USED	ACTUAL		MILLS PER KWH		R FACTOR PEAK AVE.	MONTH
502541	1	THESETT		2,11	11010111	212162	KIII OSED		DILL	120 10011	21102		
		CH	ARGE		FUEL ADJ	ENVIR.SURCH	ARGE	P/F PENA	LTY		TO,	TAL COST	
TYSON FOO	DS. INC.												128 KE*
	•				10,873	10,873	6,234,180	77.06	77.06	42.73	90.00% 9	1.00% 93.00%	01
					10,420	10,420	5,527,300	78.94	78.94	44.53	90.00% 9	0.00% 93.00%	02
					10,478	10,478	5,648,650	72.56	72.56	44.16	90.00% 9	0.00% 93.00%	03
					10,763	10,763	5,936,530	76.60	76.61	43.59	90.00% 9	1.00% 92.00%	04
					11,048	11,048	6,314,620		76.82	42.76		0.00% 91.00%	
					11,197	11,197	6,183,400		76.70	43.46		0.00% 92.00%	
	80449540	87016400	15:30	7/17	11,534		6,566,860		76.53	43.74	90.00% 9	0.00% 92.00%	07
YEAR TO	DATE				11,534	11,534	42,411,540	72.27	72.27	43.54			
CURRENT		260,27	s 50		20,462.34	15,40	9 73		. 00		28	7,236.34	
COMMENT		200,2,	0.50		NSNFPPA:		6.10- NSNF	PPA2.		75.13-	20	,,,,,,,,,,	
YEAR TO	DATE	1,695,37	2.96		39,692.21	99,88			.00	, , , , ,	1,84	6,653.87	
		_,,		_	,	22,					•	•	
**********	x +33				NSNFPPA:	44,15	0.41- NSNF	PPA2:	44,1	50.41-			096 KE*
VALLEY GR	AIN				2 266	2 266	1 200 060	72 20	73.29	46.02	00 00% 0	0.00% 80.00%	
					2,366 2,375	2,366 2,375	1,290,060 967,614		60.63	54.15		0.00% 79.00%	
					2,375	2,270	1,081,930		64.15	49.92		9.00% 79.00%	
					2,270		1,001,460		66.20	50.16		9.00% 79.00% 9.00% 78.00%	
					2,101		1,089,260		71.94	46.87		0.00% 78.00%	
					1,981		1,007,660		70.65	48.86		8.00% 73.00% 8.00% 77.00%	
	77585680	78602900	3.0	7/03	2,012	2,012	1,017,220		67.95	49.98		8.00% 77.00%	
YEAR TO		,0002300	50	7,03	2,375	2,375	7,455,204		61.69	49.24	30.000 /	0.000 ,,.000	0,
					,	·							
CURRENT		43,28	1.86		3,169.66	2,51	1.03	3,255			5	0,837.18	
					NSNFPPA:	1,05	8.93- NSNF	PPA2:		21.44-			
YEAR TO	DATE	317,97	7.70		24,430.93	18,49	5.62	21,745	5.50		36	7,128.01	
					NSNFPPA:	7,76	0.87- NSNF	PPA2:	7,7	60.87-			

Big Rivers Ex-Case No. 2015-0012. Attachment for Response to AG 1-141

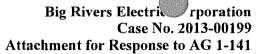
EBR106B MONTH ENDING 7/31/2013 BIG RIVERS ELECTRIC CORPORATION

PAGE 8 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	PREVIOUS		KW DEMAND. ME DAY ACTUAL		KWH USED	L.F.% ACTUAL BILLED		POWER FACTOR BASE PEAK AVE.	MONTH
		CHARGI	FUEL ADJ	ENVIR.SUR		P/F PENALTY		TOTAL COST	
TOTAL CUR TOTAL YTI YTD PEAK	D		194,292 1,297,485 194,292	1,049,940	100,834,880 682,528,200	72.49 71.66 74.89 74.01			
TOTAL CUP	RRENT	3,656,518.12	292,264.77 NSNFPPA:		747.59 640.44~ NSNF	6,930.00	9,639.17~	4,047,180.87	
TOTAL YTI	D	24,982,744.0		1,391,	181.40	41,979.00	0,699.62-	27,146,549.63	

*** NOTE - LOAD FACTOR AND MILLS PER KWH CALCULATIONS DO NOT INCLUDE WILLAMETTE VALUES ***



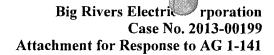
BIG RIVERS ELECTRIC CORPORATION

PAGE 9 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH	USED			MILLS PER KWH		WER FAC' PEAK		MONTH
							TAL LIN	E		<u> </u>				: : :	
		CH	ARGE		FUEL ADJ	ENVIR.SURC	HARGE	F	P/F PENA	TLA			TOTAL CO	OST	
SHELL OIL															130 JP
SHEDD OID					1,922	1,922 1,912 1,912 1,901 1,933 1,901 1,922 1,933	43	3,980	30.34	30.35	65.44	90.00%	92.00%	91.00%	01
					1,912	1,912	29	2,853	22.80	22.79	87.49	90.00%	92.00%	91.00%	02
					1,912	1,912	45	1,820	31.81	31.80	63.38	90.00%	92.00%	91.00%	03
					1,901	1,901	44	2,010	32.30	32.29	64.11	90.00%	92.00%	91.00%	04
					1,933	1,933	63	7,250	44.31	44.31	50.80	90.00%	92.00%	91.00%	05
	10690900	11264640	22.00	7/00	1,901	1,901	64	9,330	47.45	47.44	49.69	90.00%	92.00%	91.00%	06 07
YEAR TO		11204040	22:00	7/09	1,922	1,922	2 40	0 003	40.81	35 50	54.52	90.006	92.00%	91.006	0 /
					1,933	1,533	3,43	0,363	33.30	33.30	33.42				
CURRENT		28,93	3.63		1,818.93	1,8 6 12,0	63.86			.00			31,824	.29	
					NSNFPPA:	6	07.67-	NSNF	PPA2:	1	84.46-				
YEAR TO	DATE	191,03	1.98		11,592.51	12,0	95.08			. 00			207,451	.37	
ACCUPING (CORPORATIO	N T			NSNFPPA:	3,6	34.10-	NSNFF	PPA2:	3,€	34.10-				088 KE
ACCURIDE (CORPORALIO	IV			4,891	4,891	2.06	7 620	EC 02	E	43.78	00 00%	በበ በበይ	70 002	
					1 076	1 076					46.67				02
					5,035	5 035					45.27				03
					5,216	5,216	2.21	8.670	59.07	59.08	43.63	90.00%	96.00%	84.00%	04
					5,080	5,080	2.36	1.538	62.48	62.48	41.54	90.00%	97.00%	84.00%	05
					5,065	5,065	2,03	1,670	55.71	55.71	45.13	90.00%	96.00%	79.00%	06
	94907500	97148760	11:30	7/18	5,322	5,322	2,24	1,260	56.60	56.60	41.54 45.13 44.88	90.00%	96.00%	83.00%	07
YEAR TO	DATE				5,322	5,035 5,216 5,080 5,065 5,322 5,322	14,77	5,758	54.57	54.57	44.31				
CURRENT		90,62	6.10		6,983.77	6.0	22.46			.00			100,590	. 94	
		·			NSNFPPA:	2,3	33.15-	NSNFF	PA2:	7	08.24~		.		
YEAR TO	DATE	597,15	9.87		48,759.90	6,0 2,3 39,6	22.51			.00			654,779	.16	
					NSNFPPA:	15,3	81.56-	NSNFF	PA2:	15,3	81.56-				
ALCOA, INC	C PO 19	0035471													192 KE
					194	194	11	9,180	82.57	82.57	45.90				01
					184	184			78.06						02
					169	169			77.37						03
					176	176	8	7,150	68.62	68.77	66.66				04
					139	139	8	2,950	80.44 94.81	80.21	59.58				05
	10170000	10251380	4 - 0.0	7/01	116 116	116	/	9,050	94.81	94.65	53.62				06 07
YEAR TO		10231380	4:00	// 01	116	139 116 116 114			65.06		54.04 54.41	30.006	40.008	37.008	0 /
		_													
CURRENT		2,50	5.62		250.50 NGNEBDA.	1 1,4	74.75	NONET	1,522	.50	25.40-		4,344	.28	
YEAR TO	DATE	21.49	3.03		2.097.95	1 4	79.68	MOMEE	11.203	. 50	23.40-		34,937	. 18	
		, :>			_,05,.55	1,1			11,203				,,		
					NSNFPPA:	6	68.49-	NSNFE	PA2:	6	i68.49 <i>-</i>				

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 10 of 18



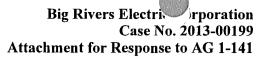
BIG RIVERS ELECTRIC CORPORATION

PAGE 10 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER	R READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH USED	ACTUAL	7.% BILLED	MILLS PER KWH	POWER FA BASE PEAK	CTOR AVE.	MONTH
		CHA	RGE		FUEL ADJ	ENVIR.SURC	HARGE I	P/F PENA	LTY		TOTAL		
ALERIS RO	OLLED PRODU	JCTS, INC.											100 KE
					28,180	28,180					90.00% 88.00		01
					27,594	27,594					90.00% 94.00		02
					28,690	28,690	16,101,490				90.00% 83.00		03
					27,537 27,367	27,537	13,736,690	69.28	69.28		90.00% 93.00 90.00% 82.00		04 05
					27,387	27,367	15,767,060	79 04	70 06		90.00% 82.00		05
	107584240	122866650	2:00	7/08	28,010	28 010	15,357,440	73 34	73 33	39.19	90.00% 95.00	\$ 90.00% \$ 91 00%	07
YEAR TO				.,	28,690	28,690	13,736,690 15,787,060 15,397,440 15,282,410 105,311,650	72.14	72.14	38.48	50.000 55.00	0 32.000	0.
CURRENT	Г	535,579	.29		47,619.99	36,5	02.90		.00		598,96 4,052,34	3.95	
ህ ሮአው ጥ/	ט האתה	2 672 520	16	2	NSNFPPA:	15,9	08.99- NSNFI	PPA2:	4,8	29.24-	4 052 34	F 61	
I BARC I	DAIL	3,072,330	.10	د	40,310.33	250,5	63.36		.00		4,032,34	5.61	
DMC DITM	TATEM MODERN	AMERICA, LI	-		NSNFPPA:	109,6	29.43 - NSNF	PPA2:	109,6	29.43-			0.66 1/1
ANG ALUM.	INOM NORTH	AMERICA, LL	ıL		1,953	2,001	924 020	56 72	55 25	44 44	90.00% 95.00	e az nne	066 KE 01
								57 55	54 73	44.44	90.00% 95.00	\$ 93.00% \$ 91 00%	02
					2,145	2,145	779,570	48.92	48.91	47.84	90.00% 96.00	% 91.00%	03
					2,032	2,032	647,150	44.22	44.23	51.92	90.00% 92.00	8 90.00%	04
					1,856	2,001	612,910	44.40	41.17	53.23	90.00% 84.00	육 89.00%	05
					1,918	2,001	605,350	43.83	42.02	53.66	90.00% 89.00	용 90.00%	06
VDAD EK	55519850	56163510	9:00	7/09	1,994	2,001	643,660	43.40	43.24	53.99	90.00% 86.00	% 89.00%	07
YEAR TO					2,145	2,145	4,848,590	44.43	44.43	49.98	90.00% 89.00 90.00% 96.00 90.00% 92.00 90.00% 84.00 90.00% 89.00 90.00% 86.00		
CURRENT	Г	30,728	.07		2,005.64 NSNFPPA: 15,913.60	2,001 2,145 2,032 2,001 2,001 2,001 2,145 1,9 6	90.00	903	.00		34,75	3.26	
<u>-</u>					NSNFPPA:	6	70.05- NSNF	PPA2:	2	03.40-			
YEAR TO	D DATE	221,202	.89		15,913.60	14,3	89.49	903	.00		242,31	4.22	
					NSNFPPA:	5,0	47.38- NSNF	PPA2:	5,0	47.38-			
ARMSTRONO	G ~ DOCK												212 KE
					8,669	8,669 9,072					90.00% 94.00		01
					9,072	9,072 10,080 9,639					90.00% 94.00		02
					10,080 9,639	9,639	3,887,410				90.00% 92.00		03 04
					9,293	9,039	3,007,410	56.01	56.01	47.19	90.00% 92.00 90.00% 92.00	\$ 94.006 \$ 94 NN\$	05
					9,173	9.173	3,621,720	54.84	54.84	48.49	90.00% 94.00	\$ 94.00%	
		97794720 1	7:00	7/18	9,419	9,419	3,652,890	52.13	52.13	49.41	90.00% 94.00 90.00% 96.00	8 94.00%	07
YEAR TO					10,080	10,080	26,911,440	52.47	52.47	46.74			
CURRENT	г	163.820	. 48		11.382.41	10 2	26.17		0.0		180,47	2 09	
		,			NSNFPPA:	3.8	02.66- NSNF	PA2:	1.1	54.31~			
YEAR TO	DATE	1,152,173	.68		11,382.41 NSNFPPA: 89,082.29	72,4	96.57		.00	•	1,257,72	2.92	
					NSNFPPA:	28,0	14.81- NSNF	PA2:	28,0	14.81-			

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 11 of 18



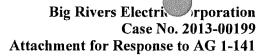
BIG RIVERS ELECTRIC CORPORATION

PAGE 11 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ T	IME DAY	KW DEMAND ACTUAL	BILLED	KWH USED		r.% BILLED	MILLS PER KWH	POWER FACTOR BASE PEAK AVE.	MONTH
		CHAR	 ভুল	FUEL ADJ	TO	TAL LINE	יייייייייייייייייייייייייייייייייייייי			TOTAL COST	
		CILAK	36	POEL ADO	ENVIR. SURC	narge i	F/F PENF	TULI		TOTAL COST	
ARMSTRONG	- EQUALIT	Y									215 KE
	~			3,200	3,200	1,557,400	65.41	65.41	42.78	90.00% 96.00% 93.00	
				3,137	3,137	1,391,500			45.14	90.00% 95.00% 93.00	b 02
				3,011	3,011	1,552,800	69.40	69.41	41.61	90.00% 94.00% 92.00	t 03
				3,251	3,251	1,507,800		64.42		90.00% 95.00% 92.00	
				3,087	3,087	1,438,810				90.00% 96.00% 91.00	
				3,156	3,156	1,446,710				90.00% 94.00% 92.00	
		46776630 21	:30 7/10	•	3,081	1,414,740				90.00% 95.00% 91.00	k 07
YEAR TO	DATE			3,251	3,251	10,309,760	62.33	62.33	43.78		
CURRENT		58,084.6	54	4,408.33	3,6	48.12		.00		64,221.29	
				NSNFPPA:	1,4	72.74- NSNFE	PPA2:		47.06-		
YEAR TO	DATE	412,750.3	31	33,986.76	26,1	19.27		.00		451,391.44	
ARMSTRONG	TEMTO C	מססמ		NSNFPPA:	10,7	32.45- NSNFE	PPA2:	10,7	32.45-		017 17
AKHSIKUNG	- DEWIS C.	KEEK		1,178	1 170	405 430	FC F3	FC F3	F2 F7	00 00% 70 00% 76 00%	217 KE k 01
				1,178	1,178 1,222	495,430	E0 14			90.00% 70.00% 76.00%	
				1,329	1,329	485,720	39.14	59.15		90.00% 98.00% 87.00% 90.00% 95.00%	
				1,481	1,329	483,260	40.93	48.94			
				2,098	3,500	485,720 483,260 599,210 665,400	42 63	26.19		90.00% 94.00% 96.00% 90.00% 87.00% 91.00%	
				2,249	3,500	741 460	45.03	29.33		90.00% 87.00% 91.00%	
	9258220	10110910 14:	00 7/31		3,500	741,460 852,690	50.53	32 75		90.00% 88.00% 90.00%	
YEAR TO			,,,,,	2,268	3,500	4,323,170			60.59	30.00% 30.00%	. 07
CURRENT		51,454.7	7 B	2,656.98	3,10	04 20		.00		56,058.86	
ooinin.		J1,1J1.	, 0	NSNFPPA:		87.65- NSNFF	י כעם		69.45-	56,058.86	
YEAR TO	DATE	238,613.9	94	14,307.37		88.58	3,538		69.43-	261,947.57	
		,			11,11	30.30	3,330	.50		201,547.57	
				NSNFPPA:	4.5	00.41- NSNFF	DA2.	4 5	00.41-		
ARMSTRONG	- MIDWAY				1,5			1,5	00.11		211 KE
				4,870	4,870	2,549,430	70.36	70.36	39.00	90.00% 94.00% 91.00%	
				5,037	5,037	2,525,210				90.00% 93.00% 92.00%	
				5,049	5,049	2,694,340	71.82	71.82	38.62	90.00% 94.00% 91.00%	03
				5,002	5,002	2,513,500	69.79	69.79	39.84	90.00% 93.00% 89.00%	04
				4,750	4,750	2,440,293			39.38	90.00% 93.00% 87.00%	05
				4,716	4,716	2,436,780			39.27	90.00% 90.00% 86.00%	06
		10651600 21:	:00 7/15	- 1	4,649	2,304,180			41.13	90.00% 90.00% 88.00%	5 07
YEAR TO	DATE			5,049	5,049	17,463,733	67.98	67.98	39.56		
CURRENT		84,984.5	56	7,179.82	5,73	38.33		.00		94,775.94	
				NSNFPPA:	2,39	98.65- NSNFP	PA2:	7	28.12-	•	
YEAR TO	DATE	626,990.9	96	57,713.68	42,56	53.21		.00		690,908.35	
				NSNFPPA:	18,1	79.75- NSNFP	PA2:	18,1	79.75-		

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 12 of 18



BIG RIVERS ELECTRIC CORPORATION

PAGE 12 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH USED		F.% BILLED	MILLS PER KWH		WER FACT		MONTH
			· · · · · ·		· <u>· · · · · ·</u> · · · · · ·	т								
		CH	ARGE		FUEL ADJ	ENVIR.SUR	CHARGE	P/F PENZ	ALTY		•	TOTAL CO	OST	
DOMTAR :	PAPER CO LLO	?			64,498	*** KWH USI 15,000	ED MAY NOT BE 29,429,310		LLED ***					108 KE 01
					49,507 46,116	15,000 15,000	25,146,660 28,807,420							02 03
					56,074	15,000	28,751,410	1						04
					69,466 69,012	35,000	30,132,340 31,256,240							05 06
YEAR '	155536300 TO DATE	188493200	3:00	7/11	68,429 69,466		32,956,900 206,480,280							07
CURRE	NT	1,042,80	7.91		80,756.99	55,0 26,9	015.00	מ במתו	.00	100 73	1,	143,410	.70	
YEAR '	TO DATE	6,872,77	8.57	4	NSNFFFA: 101,668.12	254,8	301.39	PPAZ:	.00	169./3-	7,	278,980	. 62	
					NSNFPPA:	125,1	133.73- NSNE	PPA2:	125,1	133.73-				
DOTIKI :	#3 - WEBSTER	COUNTY CO	AL CO.		187	187	77.850	55.90	55 96	44.70	90 00%	88 00%	77 00%	188 KE 01
					177	177		30.85			90.00%			
					94	94		51.48			90.00%			
					181 173	181 173	83,200	63.70	63.84	43.47	90.00%	84.00%	75.00%	04
					193	193	70,630 77,040 78,460 459,710	55 44	55 44	46.50	90.00%	83.00% 81 NN%	74 00%	05 06
	40750850	40829310	14:00	7/18	189	189	78,460	55.92	55.80	48.50	90.00%	80.00%	72.00%	07
YEAR '	TO DATE				193	193	459,710	46.81	46.81	48.46	-		-	
CURREI	NT	3,20	2.95		244.48	2	212.31		2.00			3,805.	27	
YEAR '	TO DATE	19,520	95		NSNFPPA: 1 492 78	1,2	81.68- NSNE	'PPA2: 934		24.79-		22,278	21	
	200	15,52			1,452.70	1,2	207.12	735	1.50			22,276	. 41	
ELK CREI	EK MINE - HC	PKING CO CO	ገል ፓ.		NSNFPPA:	4	178.57- NSNF	PPA2:	4	178.57~				218 KE
		111111111111111111111111111111111111111	,		139	750	36.540	35.44	6.55	234.46	90.00%	48.00%	35.00%	
					208	750		37.98		167.30				
					296	750		33.33		126.30				
					737	750		32.72			90.00%			
					554 617	750	402,050				90.00%			
	1132210	1535080	3.0	7/15	55 4	750 750	388,850	97.67		39.19 39.49				06 07
YEAR ?	TO DATE	1333000	30	7,13	737	750 750	1,530,410			55.63	30.00%	02.00%	62.00%	07
CURRE		14,230			1,255.34 NSNFPPA:	9	968.67 119.39- NSNF	PPA2 ·	.00	127.31-		15,907.	82	
YEAR 7	TO DATE	77,553	3.61		5,182.07	4,9	962.93	619	9.50			85,131	.79	
					NSNFPPA:	1,5	593.16- NSNF	PPA2:	1,5	593.16-				

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 13 of 18

Big Rivers Electron proporation Case No. 2013-00199 Attachment for Response to AG 1-141

EBR106B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

PAGE 13 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ PRESENT T		KW DEMAND	BILLED	KWH USE	L.F ACTUAL		MILLS PER KWH	POWER FACTOR BASE PEAK AVE.	MONTH
				FUEL ADJ			P/F PENA			TOTAL COST	
HOPKINS CO	O COAL, LL	c.		416 422 416 416 378	416 422 416 416 378	173,5 177,6 171,4		61.21 57.47 57.24	44.47 43.54 44.43	90.00% 99.00% 94.00% 90.00% 97.00% 94.00% 90.00% 97.00% 93.00% 90.00% 97.00% 93.00% 90.00% 95.00% 90.00%	091 KE 01 02 03 04 05
YEAR TO		15602710 10	:30 7/0	365	365 100 422	108,0 50,6	50 41.07 00 71.89 28 46.30	41.12 68.01		90.00% 95.00% 85.00% 90.00%100.00% 80.00%	06 07
CURRENT		1,846.		157.67 NSNFPPA:		52.67- NS	NFPPA2:		15.99-	2,060.40	
YEAR TO	DATE	41,326.	05	3,284.85	2,75	33.23		.00		45,274.15	
KIMBERLY-	CLARK CORP	ORATION		NSNFPPA: 37,886 37,714 38,059	1,03 37,886 37,714 38,059		50 95.54 20 94.74	95.54	33.71 35.43	90.00% 91.00% 92.00% 90.00% 91.00% 91.00% 90.00% 91.00% 91.00%	120 KE 01 02 03
YEAR TO		75366930 7	':30 7/(38,059 37,800 38,189 38,578 38,578	38,059 37,800 38,189 38,578 38,578		40 85.03 50 95.83 00 89.55	85.03 95.83 89.55	35.55 34.17	90.00% 91.00% 92.00% 90.00% 91.00% 91.00% 92.00% 90.00% 91.00% 92.00% 90.00% 91.00%	04 05 06 07
CURRENT		815,897.	43	80,089.61 NSNFPPA:	56,69 26.79	91.45 56.51- NS	NFPPA2:	.00	.22.05-	917,799.93	
YEAR TO	DATE	5,604,035.	74	589,836.39	391,00			.00		6,212,333.29	
Pennyrile YEAR TO	34	C Riveredge 2690 11	Mine .:00 7/1	NSNFPPA: 30 277 277	186,30 290 290	02.35- NS 2,6 2,6	90 1.30	1.25	1,518.83 518.83	90.00% 65.00% 34.00%	219 KE 07
CURRENT		2,930.		8.38 NSNFPPA:	10	63.52 2.80- NS		7.00	.85~	4,085.64	
YEAR TO	DATE	2,932.	34	8.38	10	63.52		7.00		4,085.64	
PATRIOT C	OAL LP			NSNFPPA:		2.80- NS			2.80-		095 KE
YEAR TO	DATE			1,877 595 1,877	3,300 3,300 3,300	182,5	10 39.10 30 45.62 40 27.41	8.23		90.00% 80.00% 35.00% 90.00% 31.00% 15.00%	01 02
CURRENT			00	.00		.00		.00		.00	
YEAR TO	DATE	77,860.	18	NSNFPPA: 1,993.93	4,7		NFPPA2:	.00	.00	83,099.71	

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 14 of 18

NSNFPPA:

758.51- NSNFPPA2:

758.51-

Big Rivers Electriorporation Case No. 2013-00199 Attachment for Response to AG 1-141

EBR106B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

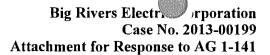
PAGE 14 DATE 8/22/13

POWER COST SUMMARY

SUBSTN	METER PREVIOUS	READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH USED	L.F ACTUAL	7.% BILLED	MILLS PER KWH	PO BASE	WER FACT	OR AVE.	MONTH
							AL LINE							
		CH	ARGE		FUEL ADJ	ENVIR.SURCE	IARGE I	P/F PENA	LTY			TOTAL CO	ST	
PRECOAT M	ETALS CORP	,			3,576	3,576	1,454,100	54 66	54 65	44 76	90 00%	90 00%	84 00%	118 KE 01
					3,546	3,576 3,546 3,568 3,561 3,523 3,538 3,644 3,644	1,337,830	56.15	56.14	47.08	90.00%	89.00%	85.00%	02
					3,568	3,568	1,324,300	49.95	49.95	47.56	90.00%	89.00%	82.00%	03
					3,561	3,561	1,489,250	58.09	58.08	44.63	90.00%	88.00%	85.00%	04
					3,523	3,523	1,429,250	54.53	54.53	44.83	90.00%	91.00%	84.00%	05
	110035330	101071070	1 7 20	7/06	3,538	3,538	1,355,870	53.23	53.23	46.35	90.00%	91.00%	83.00%	06
YEAR TO	119935230	121371870	17:30	7/26	3,644	3,644	1,436,640	52.99	52.99	46.58	90.00%	90.00%	82.00%	07
IEMA TO	DAIL				3,644	3,644	9,827,240	53.00	53.00	45.93				
CURRENT		60,40	5.02		4,476.57 NSNFPPA: 32,354.46	3,98	18.56		.00			66,920	.63	
					NSNFPPA:	1,49	5.54- NSNF	PPA2:	4	53.98-				
YEAR TO	DATE	410,65	2.76		32,354.46	27,11	.3.23	1,690	.50			451,350	. 63	
					NSNFPPA:	10,23	0.16- NSNF	PPA2:	10,2	30.16-				
SEBREE MI	NING-KMMC													098 KE
					205	205	94,530	62.04	61.98	44.93	90.00%	79.00%	97.00%	01
					208 198	208 198	75 500	59.14	59.14	45.36	90.00%	97.00%	76.00%	02 03
					180	180	45.630	35 29	35 21	60.37	90.00%	97 00%	93 00%	04
					107	107	33.580	42.10	42.18	53.66	90.00%	87.00%	91.00%	05
						117	34,800	41.45	41.31	54.26	90.00%	90.00%	91.00%	06
	31112320	31147530	13:30	7/23	110	110	35,210	42.95	43.02	53.06	90.00%	90.00%	92.00%	07
YEAR TO	DATE				208	117 110 208	82,670 75,500 45,630 33,580 34,800 35,210 401,920	37.98	37.98	49.31				
CURRENT		1.68	6.50		109.71	1.0	19.16	1.0	50			1,868.	0.9	
		-,			NSNFPPA:	3	6.65- NSNFE	PA2:		11.13-		1,000.		
YEAR TO	DATE	17,83	0.20		109.71 NSNFPPA: 1,301.02	1,16	7.94	357	.00			19,819.	34	
					NSNFPPA:	41	8.41- NSNFE	PA2:	4	18.41-				
SEBREE MI	NING-STEAM	IPORT												205 KE
					7,577						90.00%	94.00%	84.00%	01
					8,127	8,127	2,984,160	54.64	54.64	47.53	90.00%	93.00%	82.00%	02
					7,867	7,867	3,078,044	52.66	52.66	45.78	90.00%	93.00%	84.00%	03
					7,984 7,839	7,984	3,153,100	54.85	54.85	45.53	90.00%	94.00%	85.00%	04 05
					7,773	7,033	2,950,360	38 98	38 98	56 37	90.00%	92 00%	74 00%	06
	23327410	24860210	13:00	7/15	6,466	6.466	1.532.800	31.86	31.86	64.25	90.00%	97.00%	72.00%	07
YEAR TO	DATE			,	8,127	7,867 7,984 7,839 7,773 6,466 8,127	3,235,103 2,984,160 3,078,044 3,153,100 2,950,380 2,181,320 1,532,800 19,114,907	46.23	46.23	48.49	30.00.	3		
CHERENT		90 11	n 60		4 776 20	E 67	.e 22		0.0			98,483.	0.2	
COMMENT		30,11			NSNFPPA.	5,67 1 59	0.22 5.64 - NSNFF	PA2.	.00	84.36-		J0,403.	04	
YEAR TO	DATE	848,17	7.45		4,776.20 NSNFPPA: 62,992.12	55.46	1.69		.00	U1.50-		926,834.	.04	
		•			-	,								
					NSNFPPA:	19,89	8.61- NSNF	PPA2:	19,8	98.61-				

Case No. 2013-00199, Attachment for Response to AG 1-141

Witness: Lindsay N. Barron, Page 15 of 18



PAGE 15 DATE 8/22/13

EBR106B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

	F (, ,,	EΚ	_	U	۵	T	۵	U	М	М	А	к	
--	-----	------	----	---	---	---	---	---	---	---	---	---	---	--

M SUBSTN PREVI	ETER READ OUS PRESENT TIME	DAY	DEMAND ACTUAL	BILLED	KWH USED	L.F ACTUAL	7.% BILLED	MILLS PER KWH	POWER BASE PI	FACTOR EAK AVE.	MONTH
	CHARGE			TO	TAL LINE						
	CHARGE	FUE.	L ADJ	ENVIR.SURCE	AARGE I	P/F PENA	YT-T.Ā		TOT	AL COST	
SOUTHWIRE COMPA	MV										213 KE
Boothwike Comp			7,023	7,023	4,334,690	82.96	82.96	35.95	90.00% 78.	.00% 77.00%	
			6,751	6,751	3,778,440		83.29		90.00% 77.		
			6,744	6,744	4,051,860		80.86		90.00% 77.		
			7,046	7,046	4,119,850	81.21	81.21	36.91	90.00% 76.	.00% 76.00%	04
			7,023	7,023	4,275,050		81.82		90.00% 77.		
			7,235	7,235	4,430,780		85.06		90.00% 76.		
	690 52862400 23:30	7/09	7,545		4,579,710				90.00% 76.	.00% 76.00%	07
YEAR TO DATE			7,545	7,545	29,570,380	77.03	77.03	36.63			
CURRENT						170,	578.17				
	979,747.61	NS	NFPPA:	4,76	7.48- NSNF	PPA2:	1,4	47.19-			
YEAR TO DATE	979,747.61	97,43	34.65	67,55	54.06		.00		1,083,	170.78	
TYSON FOODS, IN	c	NSI	NFPPA:	30,78	32.77- NSNFI	PPA2:	30,7	82.77-			128 KE
11201 10020, 11	· ·		10,873	10,873	6,234,180	77 06	77 06	37 25	90.00% 91.	00% 03 00%	
			10,420	10,420	5,527,300		78.94		90.00% 90.		02
			10,478	10,478	5,648,650	72.56			90.00% 90.		03
			10,763	10,763	5,936,530		76.61		90.00% 91.		04
			11.048	11.048	6,314,620		76.82		90.00% 90.		05
			11,197	11,197	6,183,400				90.00% 90.		06
	540 87016400 15:30	7/17	11,534	11,534	6,566,860				90.00% 90.		07
YEAR TO DATE			11,534	11,197 11,534 11,534	42,411,540	72.27	72.27	37.99			
CURRENT	225,139.43	20,46	52.34	15,40	08.73		.00		252,	099.27	
		NSNFPPA:		6,836.10- NSNF		PPA2:	2,0	75.13-	•		
YEAR TO DATE	1,460,082.91	225,139.43 20,462.34 15,408.73 .00 2 NSNFPPA: 6,836.10- NSNFPPA2: 2,075.13- ,460,082.91 139,692.21 99,889.52 .00 1,6			1,611,	363.82					
VALLEY GRAIN		NSI	WFPPA:	44,15	0.41- NSNFE	PPA2:	44,1	50.41-			006 100
***THET GIVETIN			2,366	2,366	1,290,060	72 20	72 20	40 61	90.00% 80.	00% an 00%	096 KE 01
			2,300	2,366	967,614				90.00% 80.		01
			2,270	2,270	1,081,930				90.00% 79.		03
			2 101	2 101	1,001,460		66.20		90.00% 79.		04
			2,035	2,035	1,089,260				90.00% 80.		05
			1,981	1,981	1,007,660				90.00% 78.		06
	580 78602900 30	7/03	2,012	2,012	1,017,220				90.00% 78.		07
YEAR TO DATE		-	2,375	2,035 1,981 2,012 2,375	7,455,204			43.32			-,
CURRENT	37,117.86	3,16 NSM			1.03	3.255	.00		44.	673.18	
	·	NSN	IFPPA:	1.05	.1.03 8.93- NSNFE	PA2:	3	21.44-	,		
YEAR TO DATE	273,825.70	24,43	30.93	18,49	5.62	21,745	.50		322,	976.01	
		NSN	IFPPA:	7,76	0.87- NSNFE	PPA2:	7,7	60.87-			

Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 16 of 18





Big Rivers Education Case No. 2013-0012-2 Attachment for Response to AG 1-141

PAGE 16 DATE 8/22/13

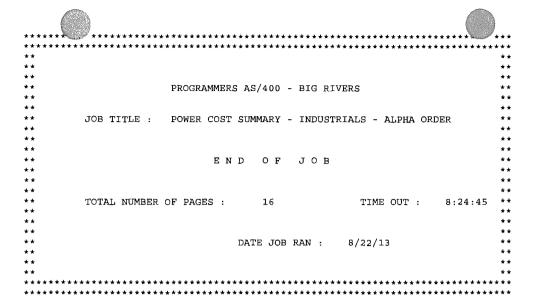
EBR106B BIG RIMONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

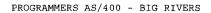
SUBSTN	METER		TIME DAY	.KW DEMAND ACTUAL	BILLED	KWH USED	L.F		MILLS PER KWH	POWER FACT	TOR AVE. MONTH
				FUEL ADJ	ENVIR.SUR		P/F PENA			TOTAL CO	
TOTAL CUR TOTAL YTE YTD PEAK				196,214 1,310,888 196,214	164,238 1,063,343 164,238	101,418,62 686,019,18		71.20 73.44	40.08 39.04		
TOTAL CUR	RRENT	3,494,143	.61 2	94,083.70 NSNFPPA:		511.45 888.55- NSN	6,930 FPPA2:		,462.80-	3,887,697	. 02
TOTAL YTE)	23,820,270	.89 1,9	983,636.92 NSNEPPA:	1,403,		41,979	.00	.033.34-	26,000,495.	. 85

*** NOTE - LOAD FACTOR AND MILLS PER KWH CALCULATIONS DO NOT INCLUDE WILLAMETTE VALUES ***



Case No. 2013-00199, Attachment for Response to AG 1-141 Witness: Lindsay N. Barron, Page 18 of 18

Big Rivers Electrorporation
Case No. 2013-00199
Attachment for Response to AG 1-141



JOB TITLE : POWER COST SUMMARY - RURALS - ALPHABETICAL ORDER

PROGRAM ID : EBR104

DEPARTMENT : GA

INDIVIDUAL : MJM

DATE JOB RAN : 8/22/13 TIME IN : 8:24:42

DATE OF REPORT: 8/22/13

SPECIAL MESSAGE :

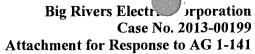
NUMBER OF COPIES: 1

JOB : 474311/FS21001492/EBR104 PGM : *LIBL/EBR105B

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron

Page 1 of 26

Big Rivers Electri orporation
Case No. 2013-00199
Attachment for Response to AG 1-141



PAGE 1 DATE 8/22/13

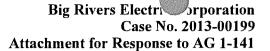
EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

SUBSTATION	METER	READ PRESENT	 TIME	DAY	W DEMAND	BILLED	KWH USED	L.F.% NON-COIN COIN.	NON-COIN KW	MONTH
Burna					2,505	2,579	1,261,880	65.76 65.76	2,579	148 JP 01
					2,728	2,582	1,078,440	58.83 62.15	2,728	02
					2,294	2,294	1,099,280	64.41 64.41	2,294	03
					1,636	1,623	731,180	61.70 62.57	1,646	04
					1,688	1,688	730,880	54.42 58.20	1,805	05 06
	5054450			T /00	2,197	2,291	925,610	55.48 56.11 53.21 56.92	2,317 2,488	07
YEAR TO DATE	6054470	7039440	17:00	7/09	2,365 2,728	2,326 2,582	984,970 6,812,240	8.44	15,857	0,
Calvert City										146 JP
carvers crey					4,467	4,484	2,534,970	69.07 75.99	4,933	01
					4,596	4,337	2,179,600	65.75 74.79	4,933	02
					3,940	3,940	2,305,920	56.14 78.66	5,521	03
					3,715	3,404	1,805,300	59.35 73.66	4,225	04
					4,743	4,743	2,071,490	45.07 58.70	6,178	05
					6,160	5,789	2,524,800	54.84 60.57	6,394	06
	9297840	11945690	17:00	7/09	6,247	5,823	2,647,850	56.66 61.12	6,281	07
YEAR TO DATE					6,247	5,823	16,069,930	8.21	38,465	
Coleman Road										138 JP
COTCHIAIT ROAG					3,180	3,309	2,486,960	68.96 101.02	4,847	01
					3,231	3,076	2,159,240	66.29 104.46	4,847	02
					2,773	2,773	2,332,090	65.37 113.04	4,795	03
					2,696	2,609	2,298,140	60.36 122.34	5,288	04
					5,737	5,737	2,669,620	60.37 62.54	5,944	05
					8,951	9,020	4,054,010	61.08 62.42	9,219	06
	55161630	58386960	17:00	7/09	6,696	6,713	3,225,330	64.24 64.58	6,748	07
YEAR TO DATE					8,951	9,020	19,225,390	9.06	41,688	
Culp										143 JP
Cuip					6,938	6,687	3,451,950	65.89 69.38	7,042	01
					7,111	7,188	3,030,400	62.74 62.74	7,188	02
					6,264	6,264	3,205,380	52.93 68.78		03
					4,959	5,003	2,448,400	62.67 67.97	5,426	04
					6,670	6,670	2,767,230	42.87 55.76		05
					8,009	8,052	3,508,350	54.02 60.52	9,020	06
	98767540	102430710	17:00	7/09	8,821	8,657	3,663,170	53.11 56.87		07
YEAR TO DATE					8,821	8,657	22,074,880	7.92	54,761	
Cumberland										210 JP
Cambalania					1,426	851	1,028,710	42.00 162.48	3,292	01
					1,469	1,559	973,540	44.06 92.93	3,288	02
					1,261	1,261	1,071,380	37.80 114.20	3,810	03
					1,361	1,516	1,001,450	39.80 91.75		04
					678	678	918,730	42.79 182.13	2,886	0.5
					2,475	938	1,009,510	39.48 149.48	3,551	06
	44120150	45106960	17:00	7/09	2,298	829	986,810	40.24 159.99		07
YEAR TO DATE					2,475	1,559	6,990,130	5.82	23,618	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 2 of 26



BIG RIVERS ELECTRIC CORPORATION

PAGE 2 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER	READ PRESENT	TIME	DAY	W DEMAND ACTUAL	BILLED	KWH USED	L.F.		NON-COIN KW	MONTH
Draffenville											155 JP
DIGITEMATITE					2,009	1,938	1,202,130	72.49	83.37	2,229	01
					1,963	1,944	1,045,030	72.50	80.00	2,145	02
					1,853	1,853	1,145,290	57.65	83.07	2,670	03
					1,464	1,477	1,060,860		99.76	2,598	04
					2,702	2,702	1,223,290		60.85	3,558	05
					3,318	3,363	1,433,080		59.18	3,506	06
	41032730	42571200	17:00	7/09	3,493	3,402	1,538,470		60.78	3,532	07
YEAR TO DATE					3,493	3,402	8,648,150	8.40		20,238	
Freemont						6 560	2 260 120	64 75	60.01	6 004	141 JP
					6,994	6,562	3,369,130	64.75	69.01	6,994	01
					7,262	7,055	2,848,770	58.38	60.09	7,262	02
					6,238	6,238	2,886,790	62.20	62.20	6,238	03
					4,873	4,657	2,020,690		60.26 52.14	4,873 5,486	04 05
					5,448	5,448	2,113,500	51.78			06
	27112200	39971890	17.00	7/00	6,549	6,852	2,699,320 2,858,590	52.60	54.71	7,128 7,322	07
YEAR TO DATE	3/113300	377/1070	17:00	7/09	7,171	7,098 7,098	18,796,790	8.15	54.13	45,303	07
TEAR TO DATE					7,262	7,098	10,790,790	0.15		45,505	
Grand Rivers											150 JP
					5,638	5,890	2,966,910	67.48	67.70	5,910	01
					6,156	6,260	2,493,830	59.28	59.28	6,260	02
					5,294	5,294	2,652,870	59.88	67.35	5,955	03
					4,704	4,704	2,041,320	60.27	60.27	4,704	04
					5,048	5,048	2,223,530	58.01	59.20	5,152	05
					6,286	6,435	2,893,570	57.54	62.45	6,985	06
	19324970	22484100	17:00	7/09	6,720	6,759	3,159,130	58.20	62.82	7,296	07
YEAR TO DATE					6,720	6,759	18,431,160	8.57		42,262	
Mile Deine											125 70
High Point					1 205	1 274	650 200	64.50	64 50	1 274	137 ДР
					1,225	1,374	659,390	62.22	64.50 63.45	1,374	01 02
					1,348	1,322 1,128	563,650 581,260	64.14	69.26	1,348 1,218	03
					1,128 901	862	421,460		67.91	940	04
					1,050	1,050	438,870		56.18	1,108	05
					1,328	1,335	534,180		55.57	1,374	06
	79514830	80055110	17.00	7/09	1,309	1,315	540,280		55.22	1,322	07
YEAR TO DATE	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	00033110	17.00	,,05	1,348	1,374	3,739,090	8.46	55.22	8,684	٠.
					_,	_,_,	-,,			-,	
Husband Road											140 JP
					5,244	5,167	2,634,030		68.52	5,244	01
					5,374	5,340	2,256,700	62.49	62.89	5,374	02
					4,856	4,856	2,337,240	64.69	64.69	4,856	03
					3,732	3,663	1,742,540	61.43	66.07	3,940	04
					5,236	5,236	1,982,150	49.58	50.88	5,374	05
				- /	6,437	6,523	2,582,720	53.64		6,687	06
VEND TO DATE	7496300	10245770	17:00	7/09	6,869	6,696	2,749,470	52.16	55.19	7,085	07
YEAR TO DATE					6,869	6,696	16,284,850	8.30		38,560	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 3 of 26

Big Rivers Electrorporation
Case No. 2013-00199
Attachment for Response to AG 1-141

EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

PAGE 3 DATE 8/22/13

Joy 1,482 1,447 750,840 66.92 69.74 1,5 1,603 1,590 634,140 58.87 59.35 1,6 1,270 1,270 643,620 65.44 68.12 1,3 994 1,028 426,470 55.98 57.62 1,0 1,002 1,002 418,320 52.50 56.11 1,0 1,188 1,326 518,050 53.22 54.26 1,3 48144990 48702530 17:00 7/09 1,374 1,352 557,540 51.47 55.43 1,4 YEAR TO DATE 5,910 5,864 2,353,760 53.53 53.95 5,9	MONTH
Kansas	3 02 2 03 8 04 1 05 2 06 6 07
4,672 4,581 1,895,230 60.37 61.56 4,6 5,398 5,398 2,298,140 56.27 57.22 5,4 3,525 3,551 1,480,840 49.36 57.92 4,1	135 JP 0 01 2 02 9 03 7 04
3,888 3,888 1,574,300 45.67 54.42 4,6 4,977 4,983 1,940,720 53.67 54.09 5,0 97880600 99950680 17:00 7/09 4,931 5,003 2,070,080 53.34 55.61 5,2 YEAR TO DATE 5,910 5,864 13,613,070 7.62 35,1	2 06 6 07 9 132 JP
5,327 5,489 2,713,330 66.44 66.44 5,4 5,754 5,761 2,306,940 59.59 59.59 5,7 4,951 4,951 2,391,190 57.47 64.92 5,5 3,655 3,648 1,626,500 61.81 61.93 3,6 4,497 4,497 1,775,100 50.17 53.06 4,7 5,424 5,670 2,257,750 54.50 55.30 5,7 91024150 93431690 17:00 7/09 5,838 5,806 2,407,540 52.68 55.73 6,1 YEAR TO DATE 5,838 5,806 15,478,350 8.19 37,1	1 02 2 03 5 04 6 05 4 06 3 07
Krebs Road 8,515 8,592 3,980,130 62.26 62.26 8,5 8,994 8,677 3,393,390 56.15 58.20 8,9 7,614 7,614 3,484,170 61.51 61.51 7,6 5,806 5,709 2,461,100 58.87 59.87 5,8 6,739 6,739 2,693,920 52.42 53.73 6,9 8,119 8,411 3,383,220 55.02 55.87 8,5 66515450 70129180 17:00 7/09 8,489 8,709 3,613,730 55.44 55.77 8,7	4 02 4 03 6 04 8 05 1 06 1 07
YEAR TO DATE 8,994 8,709 23,009,660 8.19 55,2 La Center 2,264 2,324 1,267,990 62.02 73.33 2,7 2,281 2,160 835,000 54.47 57.53 2,2 1,719 1,719 843,930 65.99 65.99 1,7 1,348 1,296 582,700 60.04 62.45 1,3 1,663 1,663 645,030 52.13 52.13 1,66 1,806 1,944 822,120 51.93 58.74 2,1 78303730 79190240 17:00 7/09 1,957 2,186 886,510 54.51 54.51 2,1	131 JP 8 01 1 02 9 03 8 04 3 05 9 06

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 4 of 26

Big Rivers Electri orporation Case No. 2013-00199 Attachment for Response to AG 1-141

EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

PAGE 4 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER	READ PRESENT	 TIME	DAY	KW DEMAND	BILLED	KWH USED N	L.F.		NON-COIN KW	MONTH
Ledbetter					6,785 7,556 5,936 4,413	6,908 7,335 5,936 4,380	3,187,580 2,696,210 2,703,740 1,725,560	61.28 53.10 61.22 54.31	62.02 54.70 61.22 54.72	6,992 7,556 5,936 4,413	144 JP 01 02 03 04
YEAR TO DATE	1457090	3815720	17:00	7/09	4,290 5,294 5,514 7,556	4,290 5,281 5,676 7,335	1,783,790 2,189,810 2,358,630 16,645,320	55.14 55.54 55.78 8.10	55.89 57.59 55.85	4,348 5,476 5,683 40,404	05 06 07
											126 70
Little Union YEAR TO DATE	79337480	83031430	17:00	7/09	8,484 8,977 7,793 6,169 8,364 9,616 7,586 9,616	8,536 8,882 7,793 6,108 8,364 9,927 10,506	4,425,890 3,768,000 3,932,240 2,926,610 3,335,730 4,170,150 3,693,950 26,252,570	68.57 62.46 67.23 64.36 53.12 56.29 46.91 8.44	63.13 67.82 66.55 53.60 58.34	8,675 8,977 7,862 6,316 8,441 10,290 10,584 61,145	136 JP 01 02 03 04 05 06 07
											124 70
Lovelaceville YEAR TO DATE	47146340	48979610	17:00	7/09	4,173 4,329 3,771 2,791 3,456 4,052 4,441 4,441	4,169 4,307 3,771 2,752 3,456 4,212 4,571 4,571	2,079,170 1,747,560 1,785,970 1,241,050 1,331,550 1,711,270 1,833,270 11,729,840	66.21 60.07 63.66 61.76 50.71 54.41 52.47 8.32	67.03 60.38 63.66 62.63 51.79 56.43 53.91	4,221 4,329 3,771 2,791 3,529 4,368 4,696 27,705	134 JP 01 02 03 04 05 06 07
Maxon											157 JP
YEAR TO DATE		794310	17:00	7/09	2,765 2,765	0 0	794,310 794,310	35.77 35.77	.00	2,985 2,985	07
New York YEAR TO DATE	88615340	90836140	17:00	7/09	5,294 5,748 4,588 3,538 4,044 4,607 5,106 5,748	5,521 5,664 4,588 3,454 4,044 4,886 5,197 5,664	2,655,830 2,224,340 2,168,520 1,490,720 1,622,090 2,019,150 2,220,800 14,401,450	64.66 57.59 63.53 58.52 52.00 55.49 54.77 8.30	64.66 58.44 63.53 59.94 53.91 57.40	5,521 5,748 4,588 3,538 4,193 5,054 5,450 34,092	133 JP 01 02 03 04 05 06 07
					- • ·	• -					
Olivet Church					3,804 3,888 3,467 2,838	3,771 3,778 3,467 2,683	1,956,580 1,685,000 1,762,290 1,496,430	68.56 63.43 66.57 62.89	69.74 66.37 68.32 77.46	3,836 3,953 3,558 3,305	153 JP 01 02 03 04

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 5 of 26

Big Rivers Electri prporation Case No. 2013-00199 Attachment for Response to AG 1-141

EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

PAGE 5 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER	READ PRESENT	 TIME	KW	DEMAND	BILLED	KWH USED	L.F. NON-COIN		NON-COIN KW	MONTH
					4.309	4,309	1,762,450	54.23	54.98	4,368	05
					5,048	5,236	2,162,920	56.39	57.37	5,327	06
	56383870	58702830	17:00	7/09	5,489	5,365	2,318,960	55.67		5,599	07
YEAR TO DATE				.,	5,489	5,365	13,144,630	8.63		29,946	
Palma											145 JP
					4,571	4,588	2,327,530	68.19	68.19	4,588	01
					4,700	4,605	2,000,750	63.35	64.65	4,700	02
					4,190	4,190	1,934,650	62.06	62.06	4,190	03
					3,136	3,119	1,576,570	61.96	70.20	3,534	04
					4,666	4,666	1,758,920		50.67	4,666	05
					5,478	5,676	2,270,190		55.55	5,728	06
	89323090	91737750	17:00	7/09	5,763	5,789	2,414,660	54.84	56.06	5,918	07
YEAR TO DATE					5,763	5,789	14,283,270	8.42		33,324	
Possum Trot											208 ЈР
					5,190	5,495	2,626,200	54.10	64.24	6,525	01
					5,100	5,003	2,315,560	49.69	68.87	6,934	02
					4,659	4,659	2,408,500	54.24	69.48	5,968	03
					3,525	3,551	1,685,260		65.91	3,894	04
					3,583	3,583	1,585,760	47.67	59.49	4,471	05
		=======		- 100	3,836	4,147	1,811,650	57.45	60.67	4,380	06
YEAR TO DATE	71757210	73667120	17:00	7/09	4,387	4,186	1,909,910 14,342,840	56.83 7.68	61.33	4,517 36,689	07
TEAR TO DATE					5,190	5,495	14,342,840	7.00		30,003	
Ragland											189 JP
					1,678	1,756	1,017,190	68.50	77.86	1,996	01
					1,905	1,905	776,250	60.64	60.64	1,905	02
					1,400	1,400	780,100	66.74	74.89	1,571	03
					1,131	1,170	521,180	58.47	61.87	1,238	04
					1,251	1,251	522,130	52.45		1,338	05
	55666556	53330610		T (00	1,468	1,562	657,610		58.47	1,623	06
YEAR TO DATE	72628330	73339610	17:00	7/09	1,597	1,601	711,280	8.63	59.71	1,688 11,359	07
TEAR TO DATE					1,905	1,905	4,985,740	8.03		11,359	
Reidland											142 ЈР
					4,523	4,588	2,634,520	75.79	77.18	4,672	01
					4,659	4,588	2,333,430	73.91	75.68	4,698	02
					4,251	4,251	2,431,730	76.19	76.89	4,290	03
					3,681	3,681	1,844,770	69.12		3,707	04
					3,635	3,635	1,759,030	57.74	65.04	4,095	05 06
	89682020	91960010	17.00	7/09	4,795 4,977	4,620	2,106,740 2,277,990	58.26 57.69	63.33 63.93	5,022 5,307	05
YEAR TO DATE	09002020	31360010	17:00	7709	4,977	4,789 4,789	15,388,210	9.51	63.33	31,791	0 7
					-,	-7.03				,	
Smithland											147 JP
					6,350	6,242	3,322,690	70.33	71.55	6,350	01
					6,657	6,519	2,865,050	64.04	65.40	6,657	02
					5,603	5,603	2,954,770	70.60	70.88	5,625	03

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 6 of 26





Big Rivers Electric rporation Case No. 2013-00199 Attachment for Response to AG 1-141

PAGE 6 DATE 8/22/13

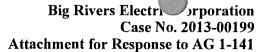
EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

	METER	READ		K	W DEMAND			L.F.%.	NON-COIN	
SUBSTATION	PREVIOUS	PRESENT	TIME	DAY	ACTUAL	BILLED	KWH USED		OIN. KW	MONTH
					4,441	4,415	2,174,010	67.28 6	8.39 4,488	04
					4,527	4,527	2,219,460	63.93 6	5.90 4,666	05
					5,219	5,871	2,512,780	59.44 5	9.44 5,871	06
	88304920	90908870	17:00	7/09	5,534	5,465	2,603,950	59.57 6	4.04 5,875	07
YEAR TO DATE					6,657	6,519	18,652,710	9.27	39,532	
Strawberry Hill										154 JP
•					6,966	6,914	4,410,810	72.67 8	5.75 8,158	01
					7,264	7,018	3,835,480		1.33 7,951	02
					6,538	6,538	4,096,330	72.07 8	4.21 7,640	03
					5,618	5,683	3,743,790	64.66 9	1.50 8,042	04
					9,927	9,927	4,383,700	59.35 5	9.35 9,927	05
					8,994	9,040	4,065,890	62.38 6	2.47 9,053	06
	65420410	70755630	17:00	7/09	11,677	11,774	5,335,220	60.08 6	0.91 11,936	07
YEAR TO DATE					11,677	11,774	29,871,220	9.36	62,707	
Vulcan										151 JP
					1,912	1,730	1,398,840	39.69 10	8.68 4,737	01
					1,983	1,879	1,167,790	54.51 9		02
					1,646	1,646	1,760,550	38.00 14		03
					4,523	3,823	1,818,770	41.42 6		04
					1,594	1,594	1,779,170	40.42 15		05
					6,363	1,659	1,739,250	37.96 14		06
	69405700	71404470	17:00	7/09	4,782	2,281	1,998,770	44.20 11		07
YEAR TO DATE				, -	6,363	3,823	11,663,140	5.94	38,607	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 7 of 26



BIG RIVERS ELECTRIC CORPORATION

PAGE 7 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER REA PREVIOUS PR	D ESENT TIME DAY			L.F.		NON-COIN KW	MONTH
JACKSON PURCHASE E	LECTRIC COOPERATI	VE CORPORATION						
			122.851 12	22,775 64,70	4.940	70.84	134,962	01
					9,320	65.65	135,280	02
					7,940	70.42	128,458	03
					3.670	68.84	104,533	04
			· ·		9,740	58.53	125,155	05
				55,049 58,50		60.17	147,604	06
		17:00 7/09		•	1,170	59.92	154,719	07
YEAR TO DATE		17.00 7703		89,874 391,16			930,711	07
TEM TO DITE			144,150 13	55,074 351,10	1,200 6.26	55.52	930,711	
	CHARGE	FUEL ADJ	TOTAL LIN	JE P/F PENALT	 Y	TOTA	L COST	
CURRENT	3,110,266.58	194,317.41 NSNFPPA:	194,526.76 64,917.98-	.0	0 19,706.13-	3,414,	486.64	
YEAR TO DATE	16,546,651.62	1,283,588.98 NSNFPPA:	1,085,216.63 407,198.81-	.0		18,384,	651.47	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 8 of 26



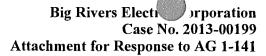
BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

PAGE 8 DATE 8/22/13

SUBSTATION	METEI PREVIOUS	R READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED	KWH USED	L.F.		NON-COIN KW	MONTH
Andyville											055, MC
					3,845	3,534	1,798,950	62.89	68.42	3,845	035, MC
					3,776	3,720	1,556,150	60.91	62.25	3,802	02
					3,102	2,972	1,635,230	64.82	73.95	3,391	03
					2,618	2,618	1,087,459		57.69	2,722	04
					2,195	2,307	1,064,310	58.92	62.01	2,428	05
					2,989	2,765	1,251,150	58.14	62.85	2,989	06
	26642690	28027440	17:00	7/09	2,964	3,158	1,384,750	55.02	58.94	3,383	07
YEAR TO DATE					3,845	3,720	9,777,999	8.52		22,560	
Battletown											051 16
Bacciecown					2,907	2,959	1,473,490	49.45	66.93	4,005	051 MC 01
					3,257	2,691	1,280,770	48.17	70.83	3,957	02
					2,735	2,687	1,316,840	48.08	65.87	3,681	03
					3,551	3,551	1,052,676	39.30	41.17	3,720	04
					2,860	1,896	1,052,790	44.68	74.63	3,167	05
					3,171	2,290	1,107,470	45.89		3,352	06
	98355270	99574550	17:00	7/09	3,028	1,961	1,219,280	47.65	83.57	3,439	07
YEAR TO DATE					3,551	3,551	8,503,316	6.60		25,321	
Dana dankaa											
Brandenburg					14 550	14 636	6 715 620	61 60	63 65	3.4.63.6	047 MC
					14,550	14,636	6,715,630	61.67	61.67	14,636	01
					14,874	14,770	5,838,900	58.42	58.83	14,874	02
					12,714 9,897	12,498 9,897	6,059,010	62.61	65.16	13,008	03 04
					10,087	9,845	4,228,771 4,377,170	58.83 58.33	59.34 59.76	9,984 10,087	05
					10,964	11,444	4,828,390	58.60	58.60	11,444	06
	141109600	146384620	17.00	7/09	11,867	11,284	5,275,020	59.29	62.83	11,444	07
YEAR TO DATE			1	., 05	14,874	14,770	37,322,891	8.53	02.03	85,991	07
					11,011	11,,,,	3,,322,032	0.55		03,331	
Cloverport											053 MC
					4,355	4,393	2,144,610	65.62	65.62	4,393	01
					4,218	4,270	1,870,420	64.10	65.18	4,342	02
					3,545	3,622	1,929,550	65.82	71.60	3,940	03
					2,858	2,858	1,386,867	62.85	67.40	3,065	04
					3,130	3,259	1,406,110	56.96	57.99	3,318	05
	E431030A	FC204070	17 00	7/00	3,959	3,732	1,666,080	58.45	62.00	3,959	06
YEAR TO DATE	54318280	56204970	17:00	7/09	4,316	4,069	1,886,690	56.88	62.32	4,458	07
IEAR TO DATE					4,355	4,393	12,290,327	8.79		27,475	
Custer											046 MC
					5,378	5,292	2,505,450	62.62	63.63	5,378	01
					5,508	5,508	2,216,920	59.89	59.89	5,508	02
					4,847	4,661	2,286,360	63.40	65.93	4,847	03
					3,750	3,750	1,372,108	49.35	50.82	3,862	04
					2,795	2,886	1,236,060	57.15	57.57	2,907	05
					3,439	3,573	1,444,960		56.17	3,663	06
VIII 0 00	55747190	57336950	17:00	7/09	3,987	3,629	1,589,760	52.28	58.88	4,087	07
YEAR TO DATE					5,508	5,508	12,651,618	8.22		30,252	

Case No. 2013-00199 Attachment for Response to AG 1-141-Witness: Lindsay N. Barron Page 9 of 26



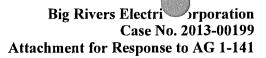
BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

PAGE 9 DATE 8/22/13

SUBSTATION	METER	READ PRESENT	TIME	DAY	DEMAND	BILLED	KWH USED	L.F.		NON-COIN KW	MONTH
							10011 0011		552111	2011	11021111
Doe Valley											124 MC
					7,435	7,158	3,198,130	56.69		7,582	01
					7,500	7,508	2,743,364	53.21	54.37	7,672	02
					6,385 4,916	6,035	2,824,120	51.03	62.90	7,439	03
					4,493	4,916 4,756	1,733,010 1,752,730	47.54	48.96 49.53	5,063 4,756	04 05
					5,028	5,486	2,073,330	52.49		5,486	06
	9366740	11626870	17:00	7/09	5,668	5,404	2,260,130		56.21	5,668	07
YEAR TO DATE			_,,,,,	., .,	7,500	7,508	16,584,814	7.46	30.21	43,666	0,
Dalls of Daugh											
Falls of Rough					5,294	E 216	2 211 600	E0 60	E0 E7	F 204	202 MC
					5,903	5,216 5,826	2,311,680 1,996,150	58.69 50.32	59.57 50.99	5,294 5,903	01 02
					4,899	4,717	2,079,380	57.05	59.25	4,899	03
					3,700	3,700	1,283,057	48.16	48.16	3,700	04
					2,974	2,935	1,327,520	51.66	60.79	3,454	05
					3,739	3,732	1,672,230		62.23	4,685	06
	53186950	55057710	17:00	7/09	4,238	3,940	1,870,760	54.04	63.82	4,653	07
YEAR TO DATE				,	5,903	5,826	12,540,777	7.56		32,588	٠.
Flaborty											
Flaherty					11 122	30 563	4 336 510	56.36	60 70	11 200	194 MC
					11,133	10,562	4,776,510	56.36		11,392	01
					11,418 9,707	11,800 9,033	4,177,820	52.69	52.69	11,800	02
					7,296	7,296	4,340,020	59.90	64.58	9,739	03
					6,111	6,415	2,413,380 2,632,980	45.17 53.64	45.94 55.17	7,420	04 05
					7,212	7,588	3,091,550		56.59	6,597 7,718	06
	31905610	35286840	17:00	7/09	8,152	7,679	3,381,230		59.18	8,152	07
YEAR TO DATE			27.00	,, 05	11,418	11,800	24,813,490	7.76	33.10	62,818	0,
P					·	•	, .				
Fordsville											048 MC
					6,584	6,722	3,041,970	57.22		7,145	01
					7,301 6,372	7,033	2,714,780	52.53	57.44	7,690	02
					5,871	6,445 5,871	2,754,110 2,094,507	56.30	57.44 49.55	6,575 6,160	03
					4,644	4,039	2,094,507	48.68		5,655	04 05
					6,087	4,825	2,255,000	49.90		6,277	06
	14461590	16874510	17:00	7/09	5,314	4,929	2,412,920		65.80	6,718	07
YEAR TO DATE				.,	7,301	7,033	17,321,277	7.37	03.00	46,220	0 /
Garrett											
Garrett					10 750						050 MC
					12,759	12,331	5,542,150	56.74		13,129	01
					13,103 11,068	13,297 10,342	4,837,730	54.14	54.14	13,297	02
					8,301	8,301	4,970,050 3,231,555	59.69 44.37	64.59 54.07	11,191 10,115	03 04
					7,083	7,459	2,904,330	52.34	52.34	7,459	04 05
					8,223	8,547	3,426,510	54.65	55.68	8,709	06
	97775690 10	01529340	17:00	7/09	9,279	8,638	3,753,650	53.92		9,357	07
YEAR TO DATE				•	13,103	13,297	28,665,975	7.69		73,257	- /

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 10 of 26



BIG RIVERS ELECTRIC CORPORATION

PAGE 10 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER	READ PRESENT	 TIME	DAY	W DEMAND	BILLED	KWH USED	L.F.		NON-COIN KW	MONTH
	211212000										
Hardinsburg #1											049 MC
*					5,819	5,957	3,087,350	69.66	69.66	5,957	01
					5,802	5,828	2,734,060	69.81	69.81	5,828	02 03
					5,054	5,219	2,867,160	73.13 41.13	73.84 41.72	5,270 7,478	04
					7,374 5,352	7,374 5,028	2,214,773 2,271,700	56.91	60.73	5,365	05
					6,277	6,152	2,671,130	59.10	60.30	6,277	06
	33716220	36680790	17:00	7/09	6,761	6,549	2,964,570	58.23	60.84	6,843	07
YEAR TO DATE	55710220	30000730	17,00	7703	7,374	7,374	18,810,743	8.59	00.01	43,018	
Hardinsburg #2											056 MC
3 '					4,052	4,169	2,109,320	68.00	68.00	4,169	01
					4,095	4,212	1,859,900	65.71	65.71	4,212	02
					3,741	3,979	1,965,180	66.38	66.38	3,979	03
					2,920	2,920	1,444,452	62.60	68.70	3,205	04
					3,037	3,063	1,493,630	62.39	65.54	3,218	05
					3,724	3,646	1,692,190	63.11	64.46	3,724	06
	56546660	58464470	17:00	7/09	4,130	3,884	1,917,810	61.58	66.37	4,186	07
YEAR TO DATE					4,130	4,212	12,482,482	9.19		26,693	
Harned											193 MC
naineu					5,054	5,145	2,605,160	66 77	68.06	5,244	01
					5,106	5,115	2,279,540	64.05	66.32	5,296	02
					4,467	4,566	2,377,300	61.13	69.98	5,227	03
					0	0	1,669,658	63.76	.00	3,637	04
					3,776	3,650	1,771,690	54.79	65.24	4,346	05
					4,843	4,324	1,940,500	54.21	62.33	4,972	06
	90272380	92429000	17:00	7/09	5,227	4,372	2,156,620	54.20	66.30	5,348	07
YEAR TO DATE					5,227	5,145	14,800,468	8.54		34,070	
T											052 MC
Irvington					9,623	9,694	4,696,940	64.39	65.12	9,804	01
					9,850	9,914	4,135,050	62.07	62.07	9,914	02
					8,819	8,631	4,285,120	64.87	66.73	8,878	03
					7,147	7,147	2,884,160	55.85	56.05	7,173	04
					6,836	6,545	2,890,070	55.81	59.35	6,960	05
					8,256	7,815	3,414,230		60.68	8,405	06
	28363510	32072660	17:00	7/09	8,599	8,016	3,709,150	56.74	62.19	8,787	07
YEAR TO DATE				•	9,850	9,914	26,014,720	8.53		59,921	
McDaniels											045 MC
					9,790	9,677	4,233,360	58.12	58.80	9,790	01
					10,259	10,229	3,703,320	53.72	53.88	10,259	02
					8,195	8,256	3,817,820	62.15	62.15	8,256	03
					6,562	6,562	2,381,254	50.40	50.40	6,562	04
					5,284	5,345	2,359,070	54.19	59.32	5,851	05
					6,615	6,721	2,955,070	48.21	61.07	8,513	06
	81846410	85236690	17:00	7/09	7,779	7,144	3,390,280	50.61	63.79	9,004	07
YEAR TO DATE					10,259	10,229	22,840,174	7.71		58,235	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 11 of 26



BIG RIVERS ELECTRIC CORPORATION

PAGE 11 DATE 8/22/13 POWER COST SUMMARY

SUBSTATION	METER PREVIOUS	READ PRESENT	TIME	DAY	V DEMAND ACTUAL	BILLED	KWH USED 1	L.F. NON-COIN	% COIN.	NON-COIN KW	MONTH
Union Star											054 MC
					3,180	3,250	1,532,950	63.40	63.40	3,250	01
					3,324	3,332	1,342,450	59.95	59.95	3,332	02
					2,811	2,773	1,387,010	66.32	67.23	2,811	03
					2,166	2,166	882,642	53.63	56.60	2,286	04
					1,915	1,983	844,050	56.81	57.21	1,997	05
					2,278	2,274	957,750	54.61	58.50	2,436	06
	2720990	3800160	17:00	7/09	2,647	2,451	1,079,170	52.98	59.18	2,738	07
YEAR TO DATE					3,324	3,332	8,026,022	8.37		18,850	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron

Page 12 of 26

Big Rivers Electric rporation Case No. 2013-00199 Attachment for Response to AG 1-141

EBR105B MONTH ENDING 7/31/2013

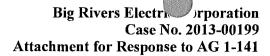
BIG RIVERS ELECTRIC CORPORATION

PAGE 12 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER R PREVIOUS	EAD PRESENT	TIME	DAY	KW DEMAND	BILLED	KWH USED	L.F.		NON-COIN	MONTH
MEADE COUNTY ELECTR	TO COOPERATIVE	י מטפטטפעי	TION								
YEAR TO DATE	10 (501 51 011 1 1 5	CONT OILL	17:00	7/09	115,293 98,460 78,928 72,571 86,804 93,956	110,695 115,053 96,436 78,927 71,411 84,914 87,107	51,773,650 45,287,324 46,894,260 31,360,329 31,432,200 36,447,540 40,251,790 283,447,093		62.86 58.57 65.36 55.19 59.16 59.62 62.11 48.32	115,013 117,686 103,131 86,152 77,565 92,609 98,779 690,935	01 02 03 04 05 06 07
TEAR TO DATE	CHARGE		FUEL A	 DJ	TOTAL L	INE	F PENALTY			TAL COST	
CURRENT YEAR TO DATE	1,729,977.14 12,074,901.35		25,424. NSNFP 27,386. NSNFP	PA: 04	110,863.92 41,902.11 792,554.39 295,068.41	- NSNFPPA	.00	19.57- 69.28-		1,643.96 0,204.09	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 13 of 26



BIG RIVERS ELECTRIC CORPORATION

PAGE 13 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER	READ	TIME	DAY	DEMAND	BILLED	KWH USED	L.F.		NON-COIN KW	MONTH
							10,11 0022		002111	4	1.01111
Adams Lane											206 KE
					5,037	5,037	2,500,020	66.12	66.71	5,082	01
					5,696	5,536	2,316,880	60.53	62.28	5,696	02
					4,691	4,691	2,350,850	64.20	67.36	4,922	03
					4,262	4,262	1,962,890	60.42	63.97	4,512	04
					3,898	3,872	1,912,980	59.96	66.41	4,288	05
	26504680	28676570	17.00	7/09	4,275	4,333	2,200,910		70.55	4,646	06
YEAR TO DATE	26304660	200/05/0	17:00	7/09	4,390	4,653	2,171,890		62.74	4,736	07
TEME TO DITTE					5,696	5,536	15,416,420	8.94		33,882	
Beda											042 KE
2000					6,409	6,409	3,344,070	70.13	70.13	6,409	012
					6,636	6,525	2,920,280	65.49	66.60	6,636	02
					5,929	5,929	3,070,650	69.38	69.61	5,949	03
					4,594	4,594	2,233,200	64.59	67.52	4,802	04
					5,288	5,307	2,256,030	56.58	57.14	5,359	05
					6,532	6,519	2,681,550		57.13	6,532	06
	48659470	51554010	17:00	7/09	6,681	6,441	2,894,540	57.62		6,752	07
YEAR TO DATE					6,681	6,525	19,400,320	8.98		42,439	
Beech Grove											072 KE
					3,797	3,797	2,029,970		71.86	3,797	01
					4,050	4,044	1,784,170	65.56	65.65	4,050	02
					3,376	3,376	1,868,350		74.38	3,545	03
					2,689	2,689	1,366,100	65.07	70.56	2,916	04
					2,929	2,890	1,416,400		65.87	3,130	05
					3,538	3,590	1,586,990		61.40	3,590	06
VEND TO DATE	45431960	47167260	17:00	7/09	3,849	3,629	1,735,300		64.27	3,849	07
YEAR TO DATE					4,050	4,044	11,787,280	9.31		24,877	
Bon Harbor											106 10
BOH Harber					4,536	4,536	2,424,040	68.88	71.83	4 770	196 KE
					4,802	4,581	2,424,040	65.15	68.29	4,730 4,802	01 02
					4,134	4,134	2,102,410	66.84	71.35	4,802	03
					3,272	3,272	1,654,470	61.89	70.23	3,713	04
					5,016	5,139	1,944,130	48.88	50.85	5,346	05
					6,324	6,221	2,453,410		54.77	6,435	06
	88797130	91610770	17:00	7/09	7,361	6,512	2,813,640		58.07	7,361	07
YEAR TO DATE				•	7,361	6,512	15,586,750	8.32		36,800	-
					•	•	. ,			,	
Caldwell Springs											197 KE
					1,873	1,873	948,820	66.25	68.09	1,925	01
					2,022	1,963	798,700	58.78	60.55	2,022	02
					1,724	1,724	834,460	58.66	65.06	1,912	03
					1,328	1,328	571,270	58.04	59.75	1,367	04
					1,464	1,413	582,970	36.21	55.45	2,164	05
					1,827	1,808	732,790	51.66	56.29	1,970	06
VEND TO DATE	63598460	64436910	17:00	7/09	2,262	1,892	838,450	48.85	59.56	2,307	07
YEAR TO DATE					2,262	1,963	5,307,460	7.63		13,667	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 14 of 26

Big Rivers Electric rporation Case No. 2013-00199 Attachment for Response to AG 1-141

PAGE

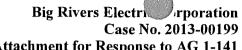
EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

14 8/22/13 DATE POWER COST SUMMARY KM DEMVND NON-COTN

	METER				KW DEMAND			L.F.		NON-COIN	
SUBSTATION	PREVIOUS	PRESENT	TIME	DAY	ACTUAL	BILLED	KWH USED	NON-COIN	COIN.	KW	MONTH
Cannelton Dam											216 KE
					564	564	295,090	60.00	70.32	661	01
					515	515	267,760	64.37	77.37	619	02
					483	483	299,350	53.29	83.30	755	03
					437	437	287,290	40.80	91.31	978	04
					499	457	247,580	25.88	72.82	1,286	05
					1,461	1,173	270,320	25.70		1,461	06
	6963330	7248270	17:00	7/09	382	875	284,940	29.48	43.77	1,299	07
YEAR TO DATE				,	1,461	1,173	1,952,330	5.44		7,059	
Centertown											0.64 150
Centertown					0.060	2 262	1 111 510	64 76	66.05	0 207	064 KE
					2,262	2,262	1,111,510	64.76		2,307	01
					2,478	2,380	964,660	57.93	60.32	2,478	02
					2,115	2,115	996,160	63.25	63.31	2,117	03
					1,631	1,631	620,660	52.09		1,655	04
					1,236	1,272	575,450	58.51		1,322	05
	74051740	E1000E00		- /	1,480	1,477	684,660	25.51		3,728	06
VERB EO DREE	/1151340	71880520	17:00	7/09	1,680	1,562	729,180	57.21	62.75	1,713	07
YEAR TO DATE					2,478	2,380	5,682,280	7.29		15,320	
Crossroads											199 KE
					4,970	4,970	2,439,930	65.38	65.99	5,016	01
					5,352	5,275	2,087,900	58.05	58.90	5,352	02
					4,627	4,627	2,145,600	62.33	62.33	4,627	03
					3,564	3,564	1,382,080	53.86	53.86	3,564	04
					3,415	3,363	1,378,140		55.08	3,603	05
					4,290	4,244	1,685,670	54.17		4,322	06
	61316440	63161090	17:00	7/09	4,698	4,296	1,844,650	52.77		4,698	07
YEAR TO DATE					5,352	5,275	12,963,970	8.17		31,182	
Dannak											
Dermont					4 445	4 445	2 250 060	67 25	71 00	4 600	039 KE
					4,445	4,445	2,350,960	67.35		4,692	01
					4,640	4,452	2,037,490	65.34		4,640	02
					1,886	1,886	1,456,960	34.89		5,612	03 04
					1,575	1,575	947,510	54.45		2,417 4,555	05
					3,201	3,285	1,266,700		51.83		06
	91903670	84727600	17.00	7/00	6,914 7,685	6,940 6,985	2,439,770 2,823,930	48.83 49.39		6,940 7,685	05
YEAR TO DATE	01303070	04/2/000	17:00	1/09					34.34		0 /
TEAR TO DATE					7,685	6,985	13,323,320	7.17		36,541	
Dixon											063 KE
					4,247	4,247	2,079,500	65.81	65.81	4,247	01
					4,380	4,316	1,777,160	60.38	61.27	4,380	02
					3,836	3,836	1,770,190	61.40	62.03	3,875	03
					2,938	2,938	1,222,560		57.79	2,938	04
					2,851	2,868	1,264,690	46.91	59.27	3,624	05
				_ 4	3,478	3,491	1,446,780		57.56	3,508	06
VEND TO DATE	41000520	42634940	17:00	7/09	3,871	3,668	1,634,420	56.56	59.89	3,884	07
YEAR TO DATE					4,380	4,316	11,195,300	8.32		26,456	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 15 of 26



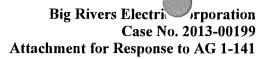
Attachment for Response to AG 1-141

EBR105B MONTH ENDING 7/31/2013 BIG RIVERS ELECTRIC CORPORATION

PAGE 15 DATE 8/22/13 POWER COST SUMMARY

SUBSTATION	METER PREVIOUS	READ PRESENT	TIME	DAY	.KW DEMAND ACTUAL	BILLED		L.F.		NON-COIN KW	MONTH
East Owensboro											204 175
					2,592	2,592	1,333,360	63 73	69.14	2,812	204 KE 01
					2,722	2,495	1,161,940		69.30	2,722	02
					4,238	4,238	1,869,840		59.30	4,368	03
					3,305	3,305	1,617,700		67.98	3,830	04
					5,242	5,294	1,778,130		45.14	5,476	05
					4,076	4,076	1,559,080	53.13	53.13	4,076	06
	27347040	28995370	17:00	7/09	4,504	4,199	1,648,330	49.19	52.76	4,504	07
YEAR TO DATE					5,242	5,294	10,968,380	7.76		27,788	
Comerce											
Geneva					5 610	5 (10	2 000 000	45.00			029 KE
					5,618	5,618	3,000,820		71.79	5,949	01
					6,279	6,185	2,483,240		59.75	6,279	02
					4,954 3,762	4,954 3,762	2,552,380 1,551,200		69.25 57.27	5,054	03
					3,762	3,920	1,807,120		61.96	3,762 4,056	04 05
					4,792	4,740	2,136,360		62.60	5,126	06
	98291370 1	100657180	17:00	7/09	5,304	5,184	2,365,810		61.34	5,378	07
YEAR TO DATE				.,	6,279	6,185	15,896,930	8.78	01.51	35,604	0 /
					-,	-,				55,001	
Guffie											033 KE
					6,216	6,216	2,958,541		63.97	6,216	01
					6,458	6,229	2,552,700		60.98	6,458	02
					5,530	5,530	2,644,350		64.27	5,530	03
					3,987	3,987	1,776,080		61.87	4,056	04
					4,324	4,221	1,789,420		56.98	4,342	05
	3887610	6291050	17.00	7/00	5,322 5,780	5,270 5,361	2,233,850		58.87	5,417	06
YEAR TO DATE	3007010	0251050	17.00	1703	6,458	6,229	2,403,440 16,358,381	8.50	60.26	5,789 37,808	07
					0,430	0,229	10,330,301	0.50		37,000	
Hanson											012 KE
					3,218	3,218	1,350,690	56.42	56.42	3,218	01
					3,164	3,104	1,164,990		55.85	3,164	02
					2,910	2,910	1,223,420	55.78	56.51	2,948	03
					2,231	2,231	787,830	48.72	49.05	2,246	04
					1,838	1,758	776,130		59.34	2,041	05
	24600010	25600070	1 7 00	7/00	2,141	2,119	867,580		56.87	2,445	06
YEAR TO DATE	24600910	25608270	17:00	7/09	2,316	2,117	1,007,360		63.96	2,590	07
TEAR TO DATE					3,218	3,218	7,178,000	7.56		18,652	
Hawesville											042 150
					6,227	6,227	3,140,890	66 96	67.80	6,305	043 KE 01
					6,143	6,188	2,785,750		66.99	6,188	02
					5,612	5,612	2,879,410		68.96	5,702	03
					4,458	4,458	2,026,980		63.15	4,510	04
					5,288	5,314	2,183,950	55.24		5,314	05
					6,396	6,467	2,589,030	55.60		6,467	06
YEAR TO DATE	31248130	34094830	17:00	7/09	7,011	6,525	2,846,700	54.17	58.64	7,063	07
TAR U DATE					7,011	6,525	18,452,710	8.73		41,549	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 16 of 26



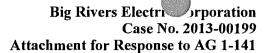
BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

PAGE 16 DATE 8/22/13

SUBSTATION	METER	READ PRESENT	TIME	DAY	DEMAND	BILLED	KWH USED	L.F.		NON-COIN KW	MONTH
Horse Fork											105 115
noise roik					5,867	5,867	3,409,550	71 11	78.11	6,445	195 KE 01
					5,944	5,711	3,409,550	68.41	79.58	6,644	01
					5,426	5,426	3,244,350	67.12	80.37	6,497	03
					4,113	4,113	3,147,710		106.29	8,726	04
					8,251	8,087	3,686,780	52.96	61.28	9,357	05
					9,279	9,452	3,898,790	56.06	57.29	9,660	06
	32030020	36124190	17:00	7/09	9,331	9,487	4,094,170	56.87	58.00	9,677	07
YEAR TO DATE				,	9,331	9,487	24,535,620	8.46		57,006	
					•		, ,			•	
Hudson Substation											187 KE
					4,102	4,102	2,813,780	72.33	92.20	5,229	01
					4,160	4,290	2,532,180	71.53	87.84	5,268	02
					4,270	4,270	2,683,420	66.11	84.47	5,456	03
					4,219	4,219	2,444,500	57.20	80.47	5,936	04
					3,933	4,115	2,583,460	71.35	84.38	4,867	05
					4,407	4,439	2,609,150	52.76	81.64	6,869	06
	17280310	19964640	17:00	7/09	4,633	4,413	2,684,330	67.90	81.76	5,314	07
YEAR TO DATE					4,633	4,439	18,350,820	9.26		38,939	
Lewisport											055
newisport					7 005	7 005	3 770 010	72 71	70 51	7 004	057 KE
					7,005	7,005	3,778,910		72.51	7,024	01
					7,018	6,487	3,351,860	71.07	76.89	7,018	02
					6,480	6,480	3,503,160	71.23	72.66	6,610	03
					5,476	5,476	2,736,750	64.82	69.41	5,864	04
					6,292	6,046	2,901,190	57.58	64.50	6,772	05
	86820740	90284480	17.00	7/09	7,206	7,232	3,348,330	58.92		7,893	06
YEAR TO DATE	00020740	50204460	17:00	1/03	7,277 7,277	7,245 7,245	3,463,740	58.89 9.24	64.26	7,906	07
TERM TO DATE					1,211	7,245	23,083,940	9.24		49,087	
Little Dixie											024 KE
					3,102	3,102	1,539,880	66,72	66.72	3,102	024 KE
					3,154	3,162	1,332,410	62.71	62.71	3,162	02
					2,549	2,549	1,382,350	67.93	72.89	2,735	03
					2,043	2,043	987,130	63.74	67.11	2,151	04
					2,290	2,268	1,026,430	59.03	60.83	2,337	05
					2,709	2,739	1,222,890		62.01	2,873	06
	10938110	12275350	17:00	7/09	2,981	2,834	1,337,240	60.13		2,989	07
YEAR TO DATE				•	3,154	3,162	8,828,330	8.97		19,349	
					.,	,	-,,			,	
Lyon County											018 KE
					3,927	3,927	1,858,880	61.07	63.62	4,091	01
					4,303	4,203	1,641,370	56.76	58.11	4,303	02
					3,871	3,871	1,831,894	63.48	63.61	3,879	03
					3,054	3,054	1,347,150	60.49	61.27	3,093	04
					3,313	3,344	1,450,270	54.36	58.29	3,586	05
				_, _	4,113	4,035	1,773,370	56.50	61.04	4,359	06
VEND TO DITE	5984270	7900850	17:00	7/09	4,553	4,242	1,916,580	54.55	60.73	4,722	07
YEAR TO DATE					4,553	4,242	11,819,514	8.29		28,033	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 17 of 26



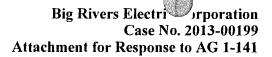
BIG RIVERS ELECTRIC CORPORATION

PAGE 17 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER	READ PRESENT	TIME	DAY	W DEMAND ACTUAL	BILLED		L.F.% ON-COIN COIN.		MONTH
Maceo										198 KE
Haces					2,838	2,838	1,426,840	60.65 67.58	3,162	01
					3,026	3,046	1,238,090	60.11 60.49	· ·	02
					2,592	2,592	1,257,440	64.09 65.20		03
					2,015	2,015	814,440	54.05 56.14	· ·	04
					2,216	2,203	827,790	49.63 50.50		05
					2,748	2,741	1,036,470	51.78 52.52		06
	87260	1255330	17:00	7/09	3,072	2,760	1,168,070	51.11 56.88		07
YEAR TO DATE					3,072	3,046	7,769,140	8.02	19,051	
Madisonville										209 KE
					4,387	4,387	2,368,070	63.87 72.55		01
					4,692	4,575	2,031,010	60.57 66.06		02
					4,154	4,154	2,161,890	67.23 69.95		03
					3,441	3,441	1,728,910	65.70 69.78		04
					3,370	3,460	1,803,480	70.06 70.06		05
					3,700	3,674	1,899,350	69.00 71.80		06
	35448230	37493050	17:00	7/09	3,933	3,888	2,044,820	67.33 70.69		07
YEAR TO DATE					4,692	4,575	14,037,530	9.41	29,315	
Marion										017 100
ralion					F 761	E 761	2 020 610	66.04 66.04	5,761	017 KE 01
					5,761	5,761	2,830,610			02
					6,318	6,085	2,426,360			
					5,216	5,216	2,605,820	61.71 67.15	,	03
					3,914	3,914	1,729,690	57.12 61.38	· ·	04
					3,745	3,966	1,578,410	52.63 53.49		05
	88025880	90163200	17.00	7/09	5,080 5,502	5,080 5,113	1,985,180 2,137,320	53.05 54.28 52.21 56.19		06 07
YEAR TO DATE	00023000	30163200	17:00	1/03	6,318	6,085	15,293,390	8.19	36,691	0 /
THAN TO DATE					0,310	0,003	15,233,330	0.19	30,031	
Masonville										034 KE
***************************************					2,961	2,961	1,682,814	64.75 76.39	3,493	01
					3,104	2,897	1,466,140	70.29 75.31		02
					2,676	2,676	1,564,310	67.74 78.57		03
					2,164	2,164	1,270,810	56.75 81.56		04
					4,342	4,400	1,571,580	47.94 48.01		05
					5,495	5,398	2,082,170	52.38 53.57		06
	11761440	14392770	17:00	7/09	6,895	5,845	2,631,330	51.29 60.51		07
YEAR TO DATE					6,895	5,845	12,269,154	8.14	29,633	
Morganfield										015 KE
					8,126	8,126	4,111,080	68.00 68.00		01
					8,443	8,210	3,606,670	63.57 65.37		02
					7,225	7,225	3,834,050	71.26 71.33		03
					5,664	5,664	2,778,270	68.05 68.13		04
					5,890	5,968	2,853,230	61.77 64.26		05
					7,225	7,225	3,323,330	62.87 63.89	•	06
MAND WO DAWN	79478910	83100980	17:00	7/09	7,770	7,595	3,622,070	61.58 64.10		07
YEAR TO DATE					8,443	8,210	24,128,700	9.31	50,927	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 18 of 26



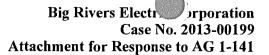
BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

PAGE 18 DATE 8/22/13

SUBSTATION	METER PREVIOUS	READ PRESENT	TIME	DAY	DEMAND	BILLED	KWH USED	L.F.		NON-COIN KW	MONTH
Niagara											
Niagara					6,474	6,474	7 020 020	62.05	C2 01	c 400	014 KE
					7,147	6,940	3,029,920 2,617,370	54.50	.62.91 56.12	6,480 7,147	01 02
					5,748	5,748	2,695,670	62.54	63.03	5,793	03
					4,044	4,044	1,590,380	51.80	54.62	4,264	04
					4,147	4,134	1,759,300	52.50	57.20	4,504	05
					5,372	5,359	2,124,790	54.61	55.07	5,404	06
	462040	2793520	17:00	7/09	5,748	5,378	2,331,480	54.22	58.27	5,780	07
YEAR TO DATE					7,147	6,940	16,148,910	8.06		39,372	
27 1 1											
Nuckols											069 KE
					4,692	4,692	2,267,180	64.95	64.95	4,692	01
					5,087	4,951	1,931,020	56.49	58.04	5,087	02
					4,620	4,620	2,122,550	59.73	61.75	4,776	03
					3,655	3,655	1,579,460	60.02	60.02	3,655	04
					3,499	3,499	1,566,970	59.53	60.19	3,538	05
	71406330	72200740	17 00	7/00	4,264	4,244	1,855,770	60.26	60.73	4,277	06
YEAR TO DATE	71406320	73309740	17:00	7/09	4,517	3,940	1,903,420	56.64	64.93	4,517	07
TEAR TO DATE					5,087	4,951	13,226,370	8.51		30,542	
Onton											011 KE
					4,766	4,766	2,353,150	65.25	66.36	4,847	011 KB
					5,187	5,184	2,030,010	58.24	58.27	5,187	02
					4,254	4,254	2,090,800	62.63	66.06	4,487	03
					3,175	3,175	1,370,350	55.22	59.95	3,447	04
					3,068	3,068	1,344,020	54.71	58.88	3,302	05
					3,684	3,710	1,593,540	55.68	59.66	3,975	06
	53584220	55320080	17:00	7/09	3,823	3,791	1,735,860	58.17	61.54	4,011	07
YEAR TO DATE				,	5,187	5,184	12,517,730	8.41	0-1-1	29,256	• •
					·	,					
Philpot											059 KE
					6,856	6,856	3,403,830	66.73	66.73	6,856	01
					6,869	6,726	2,992,770	64.84	66.21	6,869	02
					5,910	5,910	3,119,470	68.98	70.94	6,078	03
					4,795	4,795	2,410,120	67.26	69.81	4,977	04
					6,376	6,331	2,652,740	55.41	56.32	6,435	05
	162000100				7,653	7,724	3,196,270		57.47	7,724	06
YEAR TO DATE	163082190 1	166605260	17:00	7/09	8,249	8,029	3,523,070	56.74	58.98	8,346	07
TEAR TO DATE					8,249	8,029	21,298,270	8.85		47,285	
Pleasant Ridge											200 75
rreabane Rrage					4,517	4 517	2 200 000	CE 10	CE 73	4 536	200 KE
					4,964	4,517 4,834	2,209,000 1,905,060	57.11	65.73 58.65	4,536 4,964	01
					4,180	4,834	1,986,510	63.88	63.88		02 03
					3,221	3,221	1,236,040	52.26	53.30	4,180 3,285	04
					3,169	3,221	1,241,740	50.81	52.24	3,285	04 05
					3,836	3,810	1,513,720	41.60		5,054	06
	46146140	47840590	17:00	7/09	4,303	4,056	1,694,450	52.85	56.15	4,309	07
YEAR TO DATE					4,964	4,834	11,786,520	7.82	515	29,613	٠,
					-,	-,	_2,,50,320			~>, 013	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 19 of 26



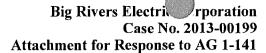
BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

PAGE 19 DATE 8/22/13

SUBSTATION	METEF PREVIOUS	R READ PRESENT	TIME	DAY	W DEMAND ACTUAL	BILLED	KWH USED	L.F.% NON-COIN COIN.	NON-COIN KW	MONTH
Providence										
Providence					4 072	4 072	2 365 600	62 07 62 05	F 041	019 KE
					4,972 5,419	4,972 5,338	2,365,600 2,010,270	63.07 63.95 55.20 56.04	5,041 5,419	01 02
					4,600	4,600	2,053,250	59.99 59.99	4,600	03
					3,267	3,267	1,303,310	55.41 55.41	3,267	04
					3,323	3,218	1,309,760	52.01 54.71	3,385	05
					3,949	3,987	1,562,740	54.19 54.44	4,005	06
	35939830	37671910	17:00	7/09	4,222	3,949	1,732,080	53.49 58.95	4,352	07
YEAR TO DATE					5,419	5,338	12,337,010	8.06	30,069	
Race Creek										067 KE
					4,925	4,925	2,315,890	63.20 63.20	4,925	01
					5,268	5,054	2,003,270	56.59 58.98	5,268	02
					4,335	4,335	2,060,990	55.23 63.90	5,016	03
					3,227	3,227	1,397,100	58.94 60.13	3,292	04
					3,927	3,882	1,555,700	51.55 53.86	4,056	05
	76461050	70504370	17 00	7/00	4,847	4,750	1,909,460	54.64 55.83	4,854	06
YEAR TO DATE	76461950	78504370	17:00	7/09	5,229	4,918	2,117,786	54.03 57.88	5,268	07
TEAR TO DATE					5,268	5,054	13,360,196	8.04	32,679	
Riverport										023 KE
					1,438	1,438	986,930	66.03 92.25	2,009	01
					1,362	1,212	924,797	55.31 113.55	2,488	02
					1,659	1,659	954,510	66.03 77.33	1,943	03
					1,249	1,249	1,013,940	42.34 112.75	3,326	04
					1,185	1,077	902,580	63.35 112.64	1,915	05
					1,273	1,363	892,250	67.13 90.92	1,846	06
	21980550	21071680	17:00	7/09	1,181	1,088	908,870	66.10 112.28	1,848	07
YEAR TO DATE					1,659	1,659	6,583,877	8.42	15,375	
G										
Sacramento										071 KE
					2,916	2,916	1,452,200	66.12 66.94	2,952	01
					3,159	3,107	1,267,750	59.72 60.72	3,159	02
					2,780	2,780	1,337,600	64.14 64.67	2,803	03
					1,963 2,061	1,963	850,450	60.17 60.17	1,963	04
					2,615	2,074 2,595	858,670 1,081,050	53.81 55.65 57.29 57.86	2,145 2,621	05 06
	85388380	86570020	17.00	7/09	2,806	2,644	1,181,640	56.60 60.07	2,821	07
YEAR TO DATE	05000500	00370020	17.00	1705	3,159	3,107	8,029,360	8.55	18,449	07
					3,133	3,10.	0,025,500	0.55	10,145	
Sebree										013 KE
					4,082	4,082	2,094,080	68.95 68.95	4,082	01
					4,478	4,361	1,809,940	60.15 61.76	4,478	02
					3,700	3,700	1,882,050	66.27 68.37	3,817	03
					2,965	2,965	1,374,280	63.48 64.38	3,007	04
					2,770	2,812	1,340,550	59.86 64.08	3,010	05
	47044600	40000000	17.00	7/00	3,606	3,600	1,582,570	59.04 61.06	3,723	06
YEAR TO DATE	47244600	48992250	17:00	7/09	4,063	3,797	1,747,650	57.81 61.86	4,063	07
TEAR TO DATE					4,478	4,361	11,831,120	8.88	26,180	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 20 of 26



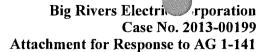
BIG RIVERS ELECTRIC CORPORATION

PAGE 20 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER PREVIOUS	READ PRESENT	TIME	KW	DEMAND ACTUAL	BILLED	KWH USED	L.F. NON-COIN		NON-COIN KW	MONTH
South Dermont											065 KE
South Delmont					6,720	6,720	4,429,320	70.24	88.59	8,476	01
					6,979	6,584	3,899,920	71.30	88.14	8,139	02
					6,260	6,260	4,131,700	69.00	88.71	8,048	03
					5,022	5,022	3,884,350		107.43	9,312	04
					12,377	12,480	4,836,140	52.08	52.08	12,480	05
					14,865	14,930	5,909,500	54.78	54.97	14,982	06
	49522430	56010670	17:00	7/09	15,682	15,092	6,488,240	55.29	57.78	15,772	07
YEAR TO DATE					15,682	15,092	33,579,170	8.55		77,209	
South Hanson											020 KE
					12,001	12,001	5,347,200	59.89	59.89	12,001	01
					12,999	12,895	4,528,040	51.84	52.25	12,999	02
					10,822	10,822	4,660,110	57.88	57.88	10,822	03
					7,705	7,705	3,024,040	54.51	54.51	7,705	04
					6,908	6,649	3,073,790	54.17		7,627	0.5
					8,891	8,780	3,720,390	57.57		8,975	06
	60651380	64575310	17:00	7/09	9,441	8,593	3,923,930	55.59	61.38	9,487	07
YEAR TO DATE					12,999	12,895	28,277,500	7.98		69,616	
South Owensboro											062 KE
boden owensboro					4,970	4,970	3,765,440	69.98	101.83	7,232	01
					5,210	5,002	3,323,680		98.88	7,141	02
					4,588	4,588	3,572,810		104.67	6,895	03
					3,953	3,953	3,452,750		121.31	8,055	04
					9,182	9,117	4,070,350	59.58	60.01	9,182	05
					10,426	10,413	4,575,470	60.46	61.03	10,511	06
	175206610	180092350	17:00	7/09	10,705	10,329	4,885,740	61.20	63.58	10,731	07
YEAR TO DATE					10,705	10,413	27,646,240	9.09		59,747	
St. Joe											036 KE
St. Joe					2 720	3,720	1,929,560	68.70	69.72	3,775	036 KE
					3,720 3,872	3,720	1,698,160	65.26	66.78	3,872	02
					3,441	3,441	1,790,010	69.60	69.92	3,457	03
					2,796	2,796	1,446,570	70.30	71.86	2,858	04
					3,447	3,386	1,603,330	62.52	63.64	3,447	05
					4,018	3,972	1,911,240	59.98		4,426	06
	38909750	41037300	17:00	7/09	4,594	4,342	2,127,550	62.25	65.86	4,594	07
YEAR TO DATE					4,594	4,342	12,506,420	9.30		26,429	
Stanley											028 KE
Country					2,479	2,479	1,252,850	65.70	67.93	2,563	026 KE
					2,686	2,670	1,096,200	60.73	61.10	2,686	02
					2,265	2,265	1,148,670	62.61	68.16	2,466	03
					1,737	1,737	779,190	45.13	62.30	2,398	04
					1,853	1,889	799,560	44.04	56.89	2,440	05
					2,440	2,462	994,300	56.09	56.09	2,462	06
	96535750	97595540	17:00	7/09	2,521	2,343	1,059,790	54.68	60.80	2,605	07
YEAR TO DATE					2,686	2,670	7,130,560	7.95		17,620	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 21 of 26



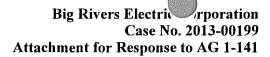
BIG RIVERS ELECTRIC CORPORATION

PAGE 21 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER	READ PRESENT	TIME	DAY	.KW DEMAND	BILLED	KWH USED	L.F. NON-COIN		NON-COIN KW	MONTH
Sullivan											027 KE
Dallivan					2,404	2,404	1,172,490	65.55	65.55	2,404	01
					2,586	2,456	987,140	56.80	59.81	2,586	02
					2,087	2,087	1,012,680	65.03	65.22	2,093	03
					1,601	1,601	677,910		58.81	1,659	04
					1,646	1,678	697,220	54.17	55.85	1,730	05
					2,093	2,106	882,410		58.19	2,249	06
	98238270	99211540	17:00	7/09	2,242	2,100	973,270	56.56	62.29	2,313	07
YEAR TO DATE					2,586	2,456	6,403,120	8.37		15,034	
Thruston											035 KE
					7,471	7,471	3,625,320	65.22	65.22	7,471	01
					7,938	7,666	3,198,620	59.96	62.09	7,938	02
					6,584	6,584	3,252,030	65.62	66.39	6,661	03
					5,067	5,067	2,322,250		63.65	5,411	04
					6,344	6,363	2,468,020		52.13	6,441	05
	52010750	56327190	17.00	7/09	7,633 8,048	7,653 7,750	3,048,620		55.33 59.25	7,815 8,392	06 07
YEAR TO DATE	32910730	30327190	17:00	1/03	8,048	7,750	3,416,440 21,331,300	8.36	59.45	50,129	07
TEAR TO DATE					0,040	7,750	21,331,300	0.36		50,129	
Utica											031 KE
					5,890	5,890	2,748,080	62.71	62.71	5,890	01
					6,357	6,273	2,369,140	55.46	56.20	6,357	02
					5,158	5,158	2,443,070	63.58	63.66	5,165	03
					3,907	3,907	1,574,630		55.98	3,946	04
					4,031	4,069	1,593,840	52.65	52.65	4,069	05
					4,944	4,925	2,002,710		56.48	5,022	06
	86388270	88584490	17:00	7/09	5,482	5,074	2,196,220		58.18	5,482	07
YEAR TO DATE					6,357	6,273	14,927,690	8.17		35,931	
Weaverton											022 KE
					4,335	4,335	2,080,050	64.49	64.49	4,335	01
					4,614	4,594	1,806,130	58.25	58.50	4,614	02
					3,739	3,739	1,858,980	64.58	66.83	3,869	03
					2,793	2,793	1,266,900		63.00	2,799	04
					3,253	3,253	1,354,560		55.97	3,525	05
	49501120	50325460	17.00	7/00	4,115	4,102	1,650,630		55.89	4,128	06
YEAR TO DATE	40501120	30323460	17:00	1/09	4,335 4,614	4,413 4,594	1,824,340	8.40	55.56	4,445	07
IBAK TO DATE					4,614	4,594	11,841,590	8.40		27,715	
Weberstown											044 KE
					6,005	6,005	2,896,190	63.33	64.82	6,147	01
					6,087	6,000	2,561,990	62.63	63.54	6,087	02
					5,638	5,638	2,609,190		62.20	5,676	03
					4,463	4,463	1,657,140		51.57	4,540	04
					3,715	3,745	1,536,580		55.15	3,862	05
					4,730	4,812	1,828,280	52.77	52.77	4,812	06
	82598910	84615030	17:00	7/09	5,020	4,679	2,016,120	51.37	57.91	5,275	07
YEAR TO DATE					6,087	6,005	15,105,490	8.16		36,399	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 22 of 26



PAGE 22 DATE 8/22/13

EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

POWER COST SUMMARY

SUBSTATION	METER	READ						L.F.		NON-COIN	MONITE
SUBSTATION	PREVIOUS	PRESENT	TIME	DAY	ACTUAL	BILLED	KWH USED I	NOM-COIN	COIN.	KW	MONTH
West Owensboro											030 KE
					5,119	5,119	2,655,940	69.74	69.74	5,119	01
					5,249	5,048	2,309,850	65.48	68.09	5,249	02
					4,491	4,491	2,435,410	65.35	72.89	5,009	03
					3,486	3,486	1,832,110	65.77	72.99 52.36	3,869	04 05
					5,391 6,564	5,255 6,623	2,047,290 2,610,330	51.04 54.74	54.36 54.74	5,391 6,623	06
	9222830	12103840	17.00	7/09	7,154	6,610	2,881,010	53.45	58.58	7,245	07
YEAR TO DATE	322230	12103010	17.00	,,05	7,154	6,623	16,771,940	8.56	50.50	38,505	0,
					.,===	-,				,	
Whitesville											040 KE
					6,402	6,402	3,153,970	66.22	66.22	6,402	01
					6,966	6,823	2,765,490	59.08	60.32	6,966	02
					5,793	5,793	2,867,350	65.72	66.53	5,864	03
					4,549	4,549	1,944,330	59.29	59.36	4,555	04
					4,711	4,847	1,959,830	54.35	54.35	4,847	05
	26509560	20170260	17.00	7/00	6,143	6,091	2,413,030	54.56	55.02	6,143	06 07
YEAR TO DATE	26508560	29170260	17:00	7/09	6,629	6,247	2,661,700	53.86 8.43	57.27	6,642 41,419	0 /
TEAR TO DATE					6,966	6,823	17,765,700	0.43		41,415	
Wolf Hills											201 KE
					2,323	2,323	1,171,350	67.77	67.77	2,323	01
					2,458	2,387	1,028,870	62.29	64.14	2,458	02
					2,035	2,035	1,062,640	70.19	70.19	2,035	03
					1,517	1,517	791,830	68.74	72.50	1,600	04
					2,003	1,990	917,990	60.07	62.00	2,054	05
					2,438	2,432	1,132,370	62.21	64.67	2,528	06
VEND ON DAME	242800	1593740	17:00	7/09	2,778	2,592	1,350,940	53.33	70.05	3,405	07
YEAR TO DATE					2,778	2,592	7,455,990	8.93		16,403	
Yeager											191 KE
100901					44	44	29,040	31.48	88.71	124	01
					46	49	25,440	31.03	77.26	122	02
					39	39	25,460	26.12	87.74	131	03
					28	28	17,026	22.10	84.45	107	04
					20	21	16,270	22.54	104.13	97	05
					17	22	18,890		119.26	113	06
	1691320	1709570	17:00	7/09	18	21	18,250		116.81	111	07
YEAR TO DATE					46	49	150,376	3.67		805	
Zion											025 KE
21011					c ncc	6,966	2 376 600	63.55	65.15	7,141	025 KE
					6,966 7,400	7,309	3,376,600 2,938,590	59.09	59.83	7,141	02
					6,026	6,026	3,002,640	65.15	66.97	6,195	03
					4,640	4,640	1,992,380	52.92	59.64	5,229	04
					5,016	5,022	2,015,760	53.12	53.95	5,100	05
					6,117	6,085	2,411,820	54.76	55.05	6,117	06
	27900870	30579670	17:00	7/09	6,577	6,072	2,678,800	53.95	59.30	6,674	07
YEAR TO DATE					7,400	7,309	18,416,590	8.25		43,856	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 23 of 26

Big Rivers Electric rporation Case No. 2013-00199 Attachment for Response to AG 1-141

EBR105B MONTH ENDING 7/31/2013

BIG RIVERS ELECTRIC CORPORATION

PAGE 23 DATE 8/22/13

POWER COST SUMMARY

SUBSTATION	METER REAL PREVIOUS PRE	SENT TIME DAY	KW DEMAND	ILLED	KWH USED NO	L.F.% N-COIN COIN.	NON-COIN KW	MONTH
KENERGY								
101101			232,573 23	2,574 1	119,239,805	68.91	242,605	01
				9,701 1	103,915,907	64.51	252,481	02
				1,256 1	108,401,454	68.97	227,356	03
				4,961	79,782,016	67.17	190,296	04
			197,452 19	7,284	84,985,000	57.90	211,039	05
				1,033 1	101,169,930	58.30	253,369	06
		17:00 7/09	259,088 24	5,168 1	110,520,896	60.59	266,146	07
YEAR TO DATE		•	259,088 24	5,168 7	708,015,008	8.47 53.71	1,643,292	
	CHARGE	FUEL ADJ	total LIN		PENALTY		TOTAL COST	
CURRENT	4,792,485.54	344,383.11 NSNFPPA:	307,454.30 115,052.25~	NSNFPPA2:	.00		294,346.10	
YEAR TO DATE	29,452,989.42	2,322,292.05 NSNFPPA:	1,939,558.47 737,043.63-	NSNFPPA2:	.00		754,063.56	

Case No. 2013-00199
Attachment for Response to AG 1-141
Witness: Lindsay N. Barron

Page 24 of 26



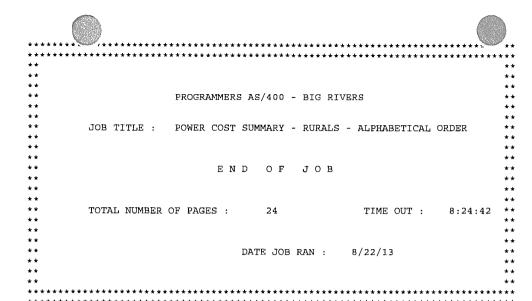
BIG RIVERS ELECTRIC CORPORATION

PAGE 24 DATE 8/22/13

POWER COST SUMMARY

	METER READ		KW DEMAND			L.F.		NON-COIN KW	MONTH
SUBSTATION	PREVIOUS PRE	SENT TIME DAY	ACTUAL	BILLED	KWU OSED	NON-COIN	COIN.	Kn	MONTH
TOTAL CURRENT			472,149	472,149	213,133,856	55.13	60.67	519,644	
TOTAL YTD			3,009,832	3,009,832	1,382,623,301	58.30	60.67	3,264,938	
YTD PEAK			479,669	479,669					
	CHARGE	FUEL ADJ			/F PENALTY			 DTAL COST	
TOTAL CURRENT	9,632,729.26	664,125.10 NSNFPPA:	612,844. 221,872.		.00	,350.30-	10,62	20,476.70	
TOTAL YTD	58,074,542.39	NSNFPPA: 4,533,267.07 NSNFPPA:	3,817,329.		.00	,908.98-	64,54	48,919.12	

Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron Page 25 of 26



Case No. 2013-00199 Attachment for Response to AG 1-141 Witness: Lindsay N. Barron

Page 26 of 26

Big Rivers Electric rporation
Case No. 2013-00199
Attachment for Response to AG 1-141

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 142)	Please provide non-coincident peak demands on a monthly basis for the
2	rurals, large	industrials, and each smelter for the years 2010, 2011, 2012 and 2013, as well
3	as the hour and date of each non-coincident peak.	
4		
5	Response)	Please see Big Rivers' response to AG 1-141.
6		
7	Witness)	Lindsay N. Barron

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 143)	Please provide monthly energy use for the rurals, large industrials and each
2	smelter for the years 2010, 2011, 2012 and 2013.	
3		
4	Response)	Please see Big Rivers' responses to AG 1-137 and AG 1-141.
5		
6	Witness)	Lindsay N. Barron

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 144)	Please refer to the Barron Direct Testimony at page 5: Provide the load
2	forecast deve	cloped by GDS, in electronic file format compatible with Microsoft Office
3	programs.	
4		
5	Response)	Please see Big Rivers' response to AG 1-139.
6		
7	Witness)	Lindsay N. Barron

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 145)	Provide documents and workpapers which show if and how the loss of
2	BREC's emp	ployment from closure of Century's Hawesville and Sebree smelting facilities
3	is taken into	consideration in performing the load forecast, especially as it pertains to
4	forecasted residential and small business demand.	
5		
6	Response)	The loss of Big Rivers' employment from the closure of the Century and
7	Alcan smelti	ng facilities was not taken into consideration in performing the load forecast
8	referenced at	pove.
9		
10	Witness)	Lindsay N. Barron

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 146)	Please refer to the Barron Direct Testimony: Provide, on a monthly basis,
2	the number o	f residential customers, number of small commercial customers, small
3	commercial e	nergy use per customer and residential energy consumption per customer for
4	each subcateg	gory used to develop load forecast. Information should be provided in
5	electronic file	format compatible with Microsoft Office programs.
6		
7	Response)	The data used to develop the forecasting models for rural system number of
8	customers and	l average use per customer are provided in the attached CONFIDENTIAL
9	electronic file	(s), provided under a petition for confidential treatment. Refer to the "Data"
10	sheet in each	spreadsheet for the data used to develop the respective model. The models for
11	each of Big R	ivers' three member cooperatives were developed using data for the rural
12	system, which	n contain all residential and commercial accounts that are not served directly
13	from a dedica	ted point of delivery. Rural system energy is metered at the substation level, so
14	it includes dis	tribution losses. The file "Monthly System Data.XLSX" is included in the
15	attached confidential electronic file(s) and contains historical monthly number of customers	
16	and energy co	onsumption by cooperative and class.
17		
18	Witness)	Lindsay N. Barron

Case No. 2013-00199 Response to AG 1-146 Witness: Lindsay N. Barron Page 1 of 1

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 147)	Please refer to the Barron Direct Testimony: Provide the actual number of
2	residential c	ustomers, number of small commercial customers, small commercial energy
3	use per customer and residential energy consumption per customer for each subcategory	
4	for the years of 2010, 2011, 2012 and 2013 YTD on a monthly basis. Information should	
5	be provided t	in electronic file format compatible with Microsoft Office programs.
6		
7	Response)	The data is provided in the attached electronic file titled "AG 1-147 Elec. Att
8	(Barron).xlsx," which is produced electronically herewith.	
9		

Witness)

10

Lindsay N. Barron

Case No. 2013-00199 Response to AG 1-147 Witness: Lindsay N. Barron Page 1 of 1

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

- 1 Item 148) Please provide the Sargent & Lundy environmental compliance study
- 2 produced by Big Rivers in Case No. 2012-00063. If necessary, please provide under seal of
- 3 confidentiality.

4

- 5 **Response**) Please see Exhibit DePriest-2 in Case No. 2012-00063 for a copy of the
- 6 Sargent & Lundy environmental compliance study.

7

8 Witness) Robert W. Berry

Case No. 2013-00199 Response to AG 1-148 Witness: Robert W. Berry

Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

- 1 Item 149) Please provide the estimated monthly payments that Century will make for
 2 Big Rivers' Transmission Service under the Century Agreement through 2016.
 3
 4 Response) Please see the response to SC 1-12(c). The annual values can be divided by
 5 twelve to estimate monthly payments.
- 7 **Witness)** Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 150)	Please provide Big Rivers' formula rate filings, and the spreadsheets used to
2	develop each	filing, for each year that Big Rivers has made such filings under Attachment
3	O of the MIS	SO OATT.
4		
5	Response)	The MISO Attachment O filings for the years 2009 through 2011 were
6	provided in r	esponse to AG 1-181 in CN 2012-00535. The filing for 2012 is provided in the
7	attached elec	tronic file titled "Attach O - RUS 12 Non-Levelized_ER13-674
8	(BREC)_fina	al.xlsx."
9		
10	Witness)	Christopher A. Warren

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 151)	Has Big Rivers conducted any economic feasibility studies regarding
2	whether its ci	ustomers can afford the cumulative proposed \$115 million rate increase? If
3	so, please pro	wide copies together with any and all documents associated therewith. If no
4	why not?	
5		
6	Response)	No. Big Rivers is sensitive to increases in its members' bills, and has taken
7	steps to mitiga	ate such increases, as described in the testimonies of several witnesses in this
8	case. That bei	ng said, the proposed increase is calculated based upon the cost-of-service
9	standard of ra	temaking, in which rate levels should be sufficient to recover operating
10	expenses plus	a fair rate of return on the investment used in providing service.
11		
12	Witness)	John Wolfram

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 152) Provide spreadsheets with formulas and links intact, and related document	'S
2	which show how Big Rivers estimated and accounted for the effects of a) price elasticity of	f
3	demand for electricity, and b) demand side management programs in its financial	
4	presentation of the rate case request (budgets, financial and operational modeling, test	
5	period results).	
6		
7	Response) Price elasticity and demand side management impact the results of the Load	
8	Forecast. The Load Forecast in turn affects budgets, financial and operational modeling and	Ŀ
9	test period results to the extent it is a fundamental input to these items. Please see the Load	
10	Forecast files provided in Big Rivers' response to AG 1-139.	
11		
12	Witness) Lindsay N. Barron	

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

Provide any economic feasibility tests undertaken by or for Big Rivers with Item 153) 1 regard to the ability of the end-user to pay his/her/its bill and thus the ability of same to 2 continue to take the projected amount of load and not decrease usage thus affecting the 3 overall demand on the system. 4 5 Big Rivers has not performed any economic feasibility tests in this regard. Response) 6 Please also see the response to AG 1-151. 7 8

John Wolfram

Witness)

9

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 154)	Provide an electronic spreadsheet copy of all supporting workpapers,
2	calculations	and source documents for each of the models or other files provided by Big
3	Rivers in resp	ponse to PSC 1-57 with formulas, links and references intact.
4		
5	Response)	Please see attached electronic files.
6		

Jeffrey R. Williams, Christopher A. Warren, John Wolfram

Witnesses)

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

	\cdot
1	Item 155) Provide the "User's Manual" or equivalent documentation for the
2	Financial forecast which shows and describes inputs, input sources, steps and operations
3	of the model, etc.
4	a. If no such User's Manual or equivalent documentation exists, describe ho
5	BREC ensures that necessary expertise to operate the Financial forecast accurately
6	remains after managers or analysts such as Mr. Siewert depart.
7	b. Explain how compliance or accuracy of the Financial Model can be
8	objectively tested by a third party when there are no underlying or supporting User
9	Manual instructions, guidelines, assumptions, and documentation.
10	c. Explain if the Financial Model has ever been evaluated or reviewed by Big
11	Rivers' auditors or another third party, and provide the related report and results of that
12	review, and provide the related contract and engagement letter describing the type of
13	review to be performed.
14	d. Explain how the internal controls of the Financial Model can be tested
15	without any User's Manual.
16	e. Explain how Big Rivers determines if any underlying assumptions or
17	formulas have not been inadvertently or intentionally altered if there is no User's Manua
18	that describes and documents the baseline assumptions and all formulae.

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	f.	State when the Financial Model (basis for the "Financial Forecast" in this
2	case) initiall	y was created by or for BREC.
3	g.	State whom created the Financial Model (basis for the "Financial
4	Forecast" in	this case) by or for BREC.
5	h.	State the names of past BREC employees who had a role deemed important
6	by BREC in	the development and creation of the Financial Model (basis for the
7	"Financial I	Forecast" in this case).
8	i.	State the names of current BREC employees who had a role deemed
9	important by	BREC in the development and creation of the Financial Model (basis for the
10	"Financial l	Forecast" in this case).
11		
12	Response)	The documentation for the financial model is attached to this response.
12 13	Response)	The documentation for the financial model is attached to this response. The documentation for the Financial Model is attached and provides a
	• ,	-
13	• ,	The documentation for the Financial Model is attached and provides a
13 14	• ,	The documentation for the Financial Model is attached and provides a description of the function of each worksheet throughout the model, the inputs
13 14 15	• ,	The documentation for the Financial Model is attached and provides a description of the function of each worksheet throughout the model, the inputs to and outputs of the Financial Model, and checks to ensure its accuracy. The

Case No. 2013-00199 Response to AG 1-155 Witness: Christopher A. Warren Page 2 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		forecast model and reconciliation processes take place to ensure that the
2		budgeted expenditures are properly incorporated into the Financial Model.
3		The budget output is also reviewed by Big Rivers' management. The model is
4		used for management of the business and to forecast short-term and long-term
5		projections.
6	b.	This is addressed in the documentation provided in part (a).
7	c.	The Financial Model has been provided electronically for review in a number
8		of rate cases to the Intervenors for their independent analysis. No external
9		party has informed Big Rivers of a flaw with the operation of the Financial
10		Model. Output from the Financial Model has been provided to creditors and
11		rating agencies.
12	d.	Please refer to the answer in (a) above.
13	e.	Please refer to the answer in (a) above.
L 4	f.	Big Rivers' has utilized a Financial Model for forecasting and analysis in a
15		similar format since the Unwind transaction and is continually updated with
16		changes that occur within the business.
17	g.	Travis Siewert, Chris Warren and Mark Hite developed and created the
18		Financial Model (basis for the "Financial Forecast" in this case).

Case No. 2013-00199 Response to AG 1-155 Witness: Christopher A. Warren Page 3 of 4

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

8	Witness)	Christopher A. Warren
7		
6		"Financial Forecast" in this case).
5		Rivers in the development and creation of the Financial Model (basis for the
4	i.	Chris Warren is a current employee who had a role deemed important by Big
3		Model (basis for the "Financial Forecast" in this case).
2		important by Big Rivers in the development and creation of the Financial
1	h.	Travis Siewert and Mark Hite are past employees who had roles deemed

Case No. 2013-00199 Response to AG 1-155 Witness: Christopher A. Warren Page 4 of 4

Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics

Overview

The Big Rivers Financial Model Tool mirrors all aspects of the Big Rivers business structure. It is used to process inputs from various sources to generate financial statements, member rates and financial metrics based on these inputs. The Model output is a forecast used to aid in making business decisions, developing forecasts for rate cases and supplying information to creditors. As a general rule throughout the model, color fonts in a cell indicate a place where data should be input and black fonts indicate cells that are outputs of a formula. The green colored tabs (worksheets) are input and calculation worksheets that provide revenue and expenses by account and populate the trial balance to create a statement of operations. The blue colored tabs (worksheets) populate portions of the Rates and Stmts RUS worksheets. The blue colored worksheets do not populate the trial balance.

Can you give a brief description of each of the worksheets in the Financial Model and its purpose?

Stmts RUS

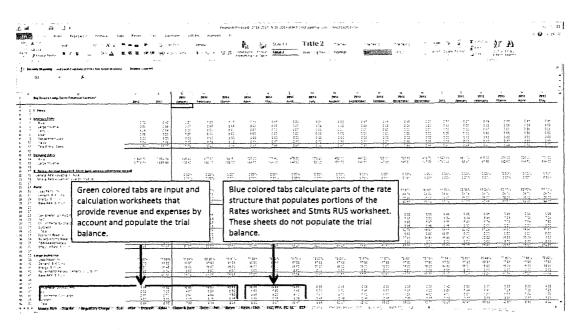
This worksheet follows RUS Accounting and is the consolidation of all of the other worksheets and provides the outputs of the model, such as financial statements, rates, debt and some financial metrics.

Trial Balance

This worksheet has links from the worksheets with green colored tabs in the model to compile a list of revenues and expenses by account. The trial balance creates the statement of operations on the Stmts RUS worksheet.

Case No. 2013-0199
Attachment for Response to AG 1-155
Witness: Christopher A. Warren
Page 1 of 9

Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics



Regulatory Charge

This sheet tracks and calculates regulatory assets and the Non-Smelter Non-Fuel Adjustment Clause Purchased Power Adjustment.

Fuel

This worksheet provides fuel expense and inventory balances. Much of the information used for the calculations on this worksheet is pulled from the PCM (Production Cost Model) worksheet.

PCM

This worksheet is where the information from the production cost model is input into the financial model. These items include energy, demand, fuel purchases, fuel burn, purchased power, market power prices, emissions and reagent expenses.

Interest

This worksheet is used to calculate interest income on cash balances.

0&M

This worksheet is where fixed expenses and miscellaneous revenues are input. These include items from the Hyperion budget tool such as labor, fixed departmental expenses, insurance, property tax, etc.

Capex & Depr

Capital and depreciation expenses are input on this worksheet. The model will calculate depreciation for long

Case No. 2013-0199
Attachment for Response to AG 1-155
Witness: Christopher A. Warren
Page 2 of 9

Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics

Debt

Big Rivers' debt is tracked on this worksheet. For debt that is already committed the information is input from amortization schedules. New debt can be modeled using projected interest rates. Use of the line of credit can also be modeled when cash levels drop below desired levels.

Pat. (Patronage)

This worksheet was added in 2012 to model the refinancing that took place with CFC and the purchase of capital term certificates as part of that transaction. It was named patronage due to the patronage allocation that is received related to this transaction.

Rates

This worksheet mirrors the Big Rivers' tariffs to create rates for the members. The final rate information is then presented on the Stmts RUS worksheet.

Rates-Cash

This worksheet was part of the calculations related the smelter agreements and is now longer used due to the smelter contract terminations.

FAC, PPA, ES, SC

This worksheet is used to calculate the Fuel Adjustment, Purchased Power Adjustment and the Smelter Surcharge (This expires with the smelter contract termination). The worksheet was used to calculate the Environmental Surcharge prior to the change in how the mechanism works. This was changed in the 2012 Environmental Compliance Plan filing (Kentucky Public Service Commission Case # 2012-00063). The Environmental Surcharge is now calculated on the ECP worksheet and that amount is used for rates.

ECP (Environmental Compliance Plan)

This worksheet was added for the 2012 Environmental Compliance Plan filing (Kentucky Public Service Commission Case # 2012-00063) and models the Environmental Surcharge calculation that was approved in this filing. The Environmental Surcharge rates are derived from allocating eligible costs on total adjusted revenue.

Charts

This worksheet summarizes financial metrics and is provided to creditors and used in loan applications.

Member Power Cost

This worksheet is required by RUS for loan applications.

Case No. 2013-0199
Attachment for Response to AG 1-155
Witness: Christopher A. Warren
Page 3 of 9

Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics

Bud. Adj. (Budget Adjustment)

This worksheet is used when modeling sensitivities. Capital or O&M expenses can be added to this worksheet and linked to the O&M or Capex worksheet. By making changes from the base case on this worksheet, the changes are easier to follow.

Rate Adj (Rate Adjustment)

This worksheet was added for the Alcan Rate Case (Kentucky Public Service Commission Case # 2013-00199) to establish a rate that would allow the Economic Reserve and Rural Economic Reserve Funds to offset the base rate increase until those funds are exhausted. The rate for the rural customers in cell B12 flows to row 39 on the rates worksheet and the rate for the large industrial customers in cell B13 flows to row 59 on the rates worksheet. By adding this cost it allows the reserve funds to give a bigger credit to the members.

What are the inputs and outputs of the Financial Model?

Outputs

The Financial Model is used to produce financial statements and financial metrics that include, but are not limited to: revenues, reserve fund balances, long-term debt structure, rates by customer class, cash flow, and Times Interest Earned Ratio.

Inputs

Inputs are from internal and external sources. These include the production cost model, output from the budget process, depreciation, rates from cost of service studies, debt amortization schedules. These sources will have their own various source of input.

Verification of the inputs is a key component of the process. There is a reconciliation process that the fixed expenses that are received from the budget department match the information within the financial model. These expenses include, but are not limited to: Labor, Fixed Departmental Expenses, Capital, Depreciation, Insurance, Property Tax, Capitalized Interest, Emission Fees, and Miscellaneous Revenues. The information from the Production Cost Model is verified with Energy Services to ensure that the correct information is included in the Financial Model. These inputs include, but are not limited to Unit Generation, MWh Sales, Demand, Reagent Expense and Fuel.

Production Cost Model

Inputs provided by the Production Cost Model include Unit Generation, Purchased Power Volumes and Expense, Coal Burn and Purchases, Unit Emissions and Reagent Expense.

Case No. 2013-0199 Attachment for Response to AG 1-155 Witness: Christopher A. Warren Page 4 of 9

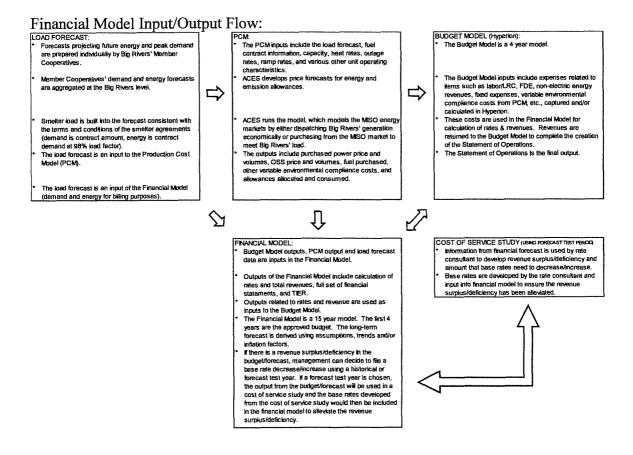
Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics

Budget

Expenses received from the Budget Department include Labor, Fixed Departmental Expenses, Depreciation, Insurance, Property Tax, Capitalized Interest, Emission Fees, and Miscellaneous Revenues.

Other

The Financial Model utilizes current Debt and Amortization schedules for any current long-term debt. New debt or debt that is refinanced during the forecast period is calculated within the Financial Model.



How long does it take to run a Financial Model?

The Financial Model is a set of dynamic formulas that operate on static and referenced input values in a grid framework. As inputs are entered or references added, the results are instantaneous. The time and effort involved in generating a Financial Model is in the business processes and analysis to provide accurate input to the model and in set up and verification of the model to handle new and changing factors relevant to the particular

Case No. 2013-0199
Attachment for Response to AG 1-155
Witness: Christopher A. Warren
Page 5 of 9

Big Rivers Electric Corporation Case No. 2012-00199 Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics

scenario. Once input is complete, it takes time to complete the reconciliation process and verify that the various inputs match the source data.

Is it possible to run different scenarios with the Financial Model? Yes. The effort required to run other scenarios depends on the scenario itself.

The Financial Model is defined to handle a known set of variables and factors. The time required to run other scenarios depend on how different the scenarios are from the base case. Most of the time requirement would involve running addition production cost models, revising a detailed capital plan, revising labor or fixed departmental expenses. The more numerous the changes the more time consuming the input and verification process would be. The most time consuming scenarios require modification to the Financial Model itself (For example modeling a change in the current rate structure), which could introduce a significant number of changes to formulas. Scenarios in this category take significantly longer due to the additional analysis, development, and testing involved.

What are the steps involved to produce a Financial Model?

The steps involved in producing a Financial Model are:

- 1) Creating the model to be used for the forecasted period. Annually the model is updated with prior year actual or most recent forecast information which is the starting point for the forecast. Year and month headings are checked to make sure that they are correct. Days in the year for each year are checked to make sure that leap years contain 366 days and normal years have 365 days. This is especially important on worksheets such as the Debt as many of the interest calculations are based on days in the year.
- 2) Links are established to external data sources including budget output files, capital spending, debt amortization schedules, demand and energy levels, depreciation and production cost model output files.
- 3) Interest income is calculated on the cash balance.
- 4) Financial Model outputs are reviewed and reconciled.

What has been done to verify the processes within the Financial Model, the engine itself, are accurate?

The Financial Model mirrors the Big Rivers' business structure and checks have been established within the model to ensure it is operating properly. On the Stmts RUS worksheet there are balance checks on rows 192 & 302 to ensure the financial statements are in balance. On the Trial Balance worksheet there is a balance check on row 574 to ensure that the trial balance is equal to the Net Margins on the Statement of Operations.

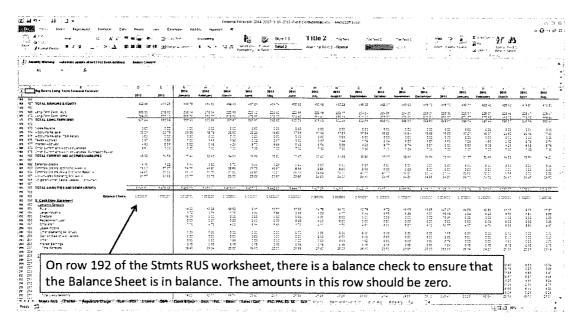
Case No. 2013-0199 Attachment for Response to AG 1-155 Witness: Christopher A. Warren Page 6 of 9

Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics

Changes can be made to the model to see if an expected result occurs. For example, if \$1 million of expense is added to the O&M worksheet, the expected outcome to the Net Patronage Capital or Margin line on the Stmts RUS worksheet would be a decrease in margins of \$1 million.

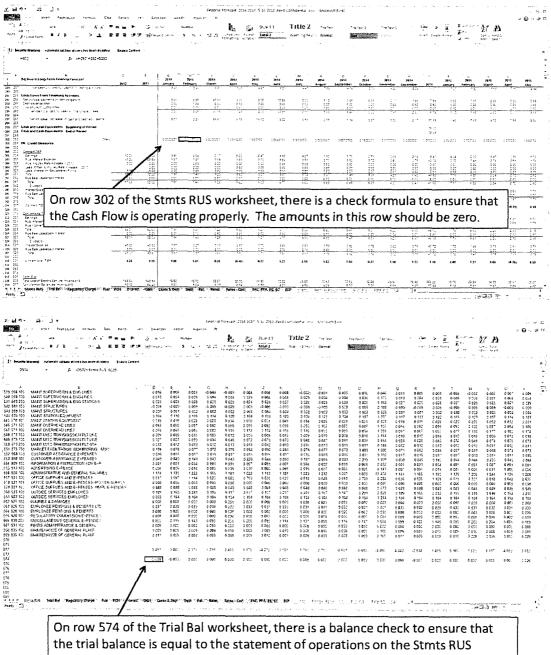
In another example if a cost that flows through to the customers such as fuel is increased \$1 million, an expected outcome would be member revenues increasing (due to the increase in the Fuel Adjustment Clause) by the percentage of the \$1 million attributable to member sales. The portion attributable to off-system sales would be expected to lower the Net Patronage Capital or Margin line on the Stmts RUS worksheet.

During the reconciliation process, attention is given to the Economic and Rural Economic reserve fund balances to mark the time at which they are exhausted.



Case No. 2013-0199
Attachment for Response to AG 1-155
Witness: Christopher A. Warren
Page 7 of 9

Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics



worksheet. The amounts in this row should be zero,

Case No. 2013-0199 Attachment for Response to AG 1-155 Witness: Christopher A. Warren Page 8 of 9

Attachment for the Response to AG 1-155 Financial Model Overview Framework with Statistics

Model Statistics

∜Sheet ⊮Name	Used Cells	Formulas	Numeric Formulas	Text Formulas	Constants	Numeric Constants	Text Constants
Stmts RUS	8,580	7,967	7,967		613	258	355
Trial Bal	4,219	3,944	3,920	24	275	58	217
Regulatory Charge	1,687	1,343	1,319	24	344	74	270
Fuel	1,738	1,419	1,395	24	319	60	259
PCM	3,776	3,253	3,229	24	523	164	359
Interest	617	289	265	24	328	100	228
O&M	7,037	6,374	6,346	24	663	200	463
Capex & Depr	1,658	1,341	1,317	24	317	61	256
Debt	2,479	2,038	2,004	24	441	132	309
Pat.	1,241	926	901	24	315	70	245
Rates	5,531	4,757	4,733	24	774	356	418
Rates - Cash	1,181	1,132	1,108	24	49	2	47
FAC, PPA, ES, SC	1,099	960	936	24	139	94	45
ECP	1,194	1,098	1,074	24	96	36	60
Charts	1,232	964	958		268	129	139
Member Power Cost	120	95	95		25	2	23
Bud. Adj.	92	74	50	24	18		18
Rate Adj	14	5	5		9	2	7
Totals	43,495	37,979	37,622	336	5,516	1,798	3,718

Case No. 2013-0199 Attachment for Response to AG 1-155 Witness: Christopher A. Warren Page 9 of 9

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1.	Item 156)	Please provide complete source documentation for all inputs into the
2	Financial for	recast, in electronic spreadsheet readable file format.
3		
1	Response)	Source files for input into the financial forecast were provided in responses to
5	PSC 1-57 and	d AG 1-227. The documentation in response to AG 1-155 describes where this
5	information is	s input into the model.
7		
3	Witness)	Christopher A. Warren

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

- 1 Item 157) Provide spreadsheets linked to formulas in Big Rivers Financial forecast in
 2 Exhibit Warren-2 electronically in format compatible with Microsoft Office programs.
 3 Spreadsheets should include all formulas and links and include any spreadsheets linked to
 4 Big Rivers Financial forecast in Exhibit Warren-2.
 5
 6 Response) Please refer to Big Rivers' response to PSC 2-22.
- 8 Witness) Christopher A. Warren

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 158)	Please provide copies of the summary results of all Financial Model runs
2	provided to t	he Big Rivers Board of Directors in the period January 1, 2012 to current.
3		
4	Response)	For summary results of all Financial Model runs provided to the Big Rivers
5	Board of Dir	ectors from January 1, 2012 through December 31, 2012, please reference Big
6	Rivers' respo	onse to AG 1-167 in Case No. 2012-00535.
7	For th	ne presentation derived from the Financial Model that was presented to the
8	Board of Dir	ectors on November 16, 2012 for approval of the Financial Plan, please see the
9	response to F	PSC 2-19.
10	Copie	es of all other CONFIDENTIAL summary results of Financial Model runs are
11	attached here	eto with a petition for confidential treatment.
L2		
L3	Witness)	Christopher A. Warren

CONFIDENTIAL ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 159) Please provide copies of the summary results of all Financial Model runs
2	provided to the Big Rivers senior management in the period January 1, 2012 to current.
3	
4	Response) For summary results of all Financial Model runs provided to the Big Rivers
5	senior management from January 1, 2012 through December 31, 2012, please reference Big
6	Rivers' response to AG 1-168 in Case No. 2012-00535.
7	For the presentation derived from the Financial Model that was reviewed by senior
8	management prior to being presented to the Board of Directors on November 16, 2012 for
9	approval of the Financial Plan, please see the response to PSC 2-19.
10	Please reference AG 1-158 and AG 1-266 for the confidential summary results of all
11	Financial Model runs provided to Big Rivers senior management in the period from January
12	1, 2013 to the present.
13	
14	Witness) Christopher A. Warren

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 160)	Please provide the "final" Financial Model produced to the Commission in
2	the "Unwina	l" case (2007-00455), in electronic spreadsheet format with all formulae
3	intact.	
4	<i>a</i> .	If this model is claimed to be confidential by BREC, please state and
5		explain the basis for the confidentiality claim years after the Unwind
6		transaction.
7		
8	Response)	Please refer to the Excel spreadsheet named "AG 1-7 (CONFIDENTIAL)
9	(Siewert)(At	tachment Unwind Presentation 10 4 08)" provided in response to AG 1-7 in
10	Case Numbe	er 2012-00535.
11	a.	The Financial Model produced in the "Unwind" case (2007-00455) was filed
12		pursuant to a petition for confidentiality; confidentiality was granted; and
13		confidentiality has not been revoked.
14		
15	Witness)	Christopher A. Warren

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 161)	Did the production cost model provided in response to PSC 1-57 ("PCM
2	Run") inclu	de input from a MISO market price forecast that assumed restrictions on CO2
3	emissions? If so please provide an updated production cost model without any assumed	
4	restrictions o	on CO2 emissions.
5		
6	Response)	No. The ACES market power price forecasts used in the PCM did not include
7	any restriction	ons on CO2 emissions.
8		
9	Witness)	Robert W. Berry

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 162)	Please provide any other production cost model runs similar to that provided
2	in response to	PSC 1-57 that were performed as sensitivity runs to different assumed
3	market or reg	ulatory conditions. Please explain and describe why these sensitivity runs
4	were selected	and why they were rejected.
5		
6	Response)	Big Rivers objects that this request is unduly vague and ambiguous insofar as
7	the last senten	ace of this request incorrectly assumes that sensitivity runs have been
8	"rejected." N	otwithstanding that objection, and without waiving the same, Big Rivers states
9	as follows.	
10	Sensit	ivity runs are performed in order to assist the company with planning for
11	reasonably ide	entifiable and reasonably contingent circumstances. Please see Big Rivers'
12	response to A	G 1-98 for the production cost model output files and the eleven (11) sensitivity
13	runs to PSC 1	-57 listed below.
14	"AG 1-98, PC	M Run, WilsonColeIdle, 10% higher (5-3-13).xlsx"
15	"AG 1-98, PC	M Run, WilsonColeIdle, 10% lower (5-3-13).xlsx"
16	"AG 1-98, PC	M Run, All Running, 10% higher (5-3-13).xlsx"
17	"AG 1-98, PC	M Run,All Running,10% lower (5-3-13).xlsx"
18	"AG 1-98, PC	CM Run, WilsonIdle (4-23-13).xlsx"

Case No. 2013-00199 Response to AG 1-162 Witness: Robert W. Berry Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	"AG 1-98, PCM Run, ColemanIdle (4-23-13).xlsx"	
2	"AG 1-98, PCM Run, ColeGreenIdle (4-23-13).xlsx"	
3	"AG 1-98, PCM Run, WilsonGreenIdle (4-23-13).xlsx"	
4	"AG 1-98, PCM Run, Wilson Cole Idle-Back (4-22-13).xlsx"	
5	"AG 1-98, PCM Run, WilsonColeIdle (4-15-13).xlsx"	
6	"AG 1-98, PCM Run,All Running (4-15-13).xlsx"	
7	These sensitivity runs are fifteen year runs where the run provided in PSC 1-57 was	
8	only a four year run. There were four sensitivity runs at different assumed market conditions	
9	with the two runs at 10% higher market prices and the two runs at 10% lower market prices.	
10	The other runs were sensitivities around what generating units were operating.	
11	Sensitivity runs are selected to provide insight to "what if" scenarios. In this case,	
12	what will the production outlook be if the power market prices were 10% higher or 10%	
13	lower? There were no sensitivity runs due to different regulatory conditions but sensitivity	
14	runs are being planned. A sensitivity run with both Green units converted to natural gas and	
15	sensitivity run with the IHS projected environmental laws used in their Global Redesign	
16	scenario will be run.	
17		
18	Witness) Robert W. Berry	

Case No. 2013-00199 Response to AG 1-162 Witness: Robert W. Berry Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

1	Item 163)	Please provide the complete spreadsheet labeled
2	BRECMISO	monthlyLoadForecast2012-09.xlsm referenced in cells $A2$ and $I2$ in the tab
3	labeled "Ene	ergyInputs" of spreadsheet "Demand and Energy," with all cells intact in
1	executable fo	ormat and labeled, provided in response to PSC 1-57.
5		
5	Response)	Please find the attached CONFIDENTIAL electronic file(s) accompanying
7	these respons	es, provided under a petition for confidential treatment.
3		
9	Witness)	Lindsay N. Barron

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

1	Item 164) Please provide the complete spreadsheet labeled	
2	BRECMIKSOmonthlyLoadForecast2012-05.xlsm referenced in cell A1 in the tab labeled	!
3	"HMPLMonthly" of spreadsheet "Demand and Energy," with all cells intact in executable	le
4	format and labeled provided in response to PSC 1-57.	
5		
6	Response) Cell A1 does not reference a spreadsheet labeled	
7	"BRECMIKSOmonthlyLoadForecast2012-05.xlsm." Cell A1 does reference a spreadsheet	
8	labeled "BRECMISOmonthlyLoadForecast2012-05.xlsm." Therefore, please find the	
9	referenced file named "BRECMISOmonthlyLoadForecast2012-05.xlsm" in the attached	
10	CONFIDENTIAL electronic file(s) accompanying these responses, submitted under a	
11	petition for confidential treatment. Regarding the request for the file to be to be in	
12	"executable format," Big Rivers notes that any macros contained in the file may not run	
13	properly unless the file is in a specific location on a Big Rivers network drive.	
14		
15	Witness) Lindsay N. Barron	

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 165)	Please provide all other sensitivity runs made when the spreadsheet "PCM
2	Run" provided in reply to PSC 1-57 discovery was created and provide the spreadsheets	
3	related to these sensitivities.	
4		
5	Response)	Please see the CONFIDENTIAL electronic file(s) containing the PCM runs,
6	attached to Big	g Rivers' response to AG 1-98.
7		

Robert W. Berry

Witness)

ELECTRONIC ATTACHMENT(S) PRODUCED SEPARATELY

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 166)	Please refer to the following tabs and cells in the Financial Forecast	
2	provided in response to PSC 1-57, and provide supporting documentation and associated		
3	Excel spread	sheets with formulas, references and links intact for the following cells:	
4	<i>a</i> .	State what convention (i.e., colors) is used to indicate inputs to the	
5		Financial Forecast.	
6	<i>b</i> .	Tab "Stmnts RUS": cells E131:E185 (excluding those cells with referenced	
7		worksheet tab or formula calculation);	
8		i. Identify the witness who can testify to the veracity of each of these	
9		inputs.	
10	с.	Tab "Rates": cells D29:AE29.	
11			
12	Response)		
13	a.	Please refer to the documentation provided in Big Rivers' response to AG 1-	
14		155 for color conventions within the model.	
15	b.	The input for cells E131:E185 represent 2013 year-end balance sheet	
16		information as projected at the time the forecast was prepared.	
17		i. Christopher Warren is the responsible witness for these inputs.	

Case No. 2013-00199 Response to AG 1-166 Witness: Christopher A. Warren Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

4	Witness)	Christopher A. Warren
3		
2		expense that was rolled into base rates in Case No. 2011-00036.
1	c.	Cells D29:AE29 on the "Rates" worksheet represent the \$10.212/MWh of fue

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 167)	Please refer to the following tab and cell in the Financial Forecast provided		
2	in response t	o PSC 1-57: cell D55 ("Interest Rate") of the "Debt" tab.		
3	a.	Please state what is the function of this input in the Financial Forecast		
4		model.		
5	<i>b</i> .	Please state whether modifying the interest rate input in D55 will flow		
6		through to modify the base period and test period results depicted on the		
7		"Stmts RUS" tab of the Financial forecast.		
8	с.	If modifying the interest rate input does modify the outputs on the "Stmts		
9		RUS" tab, identify and explain each step that must be taken to achieve that		
10		result.		
11	d.	If modifying the interest rate input does not modify the outputs on the		
12		"Stmts RUS" tab, explain why not.		
13	e.	If modifying the interest rate input does not modify the outputs on the		
14		"Stmts RUS" tab, explain where and how within the Financial forecast		
15		interest rates can be modified with the effects flowing through to the "Stmts		
16		RUS" tab.		
17				
18				

Case No. 2013-00199 Response to AG 1-167 Witness: Christopher A. Warren Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Response)	
2	a.	The function for cell D55 on the "Debt" worksheet is to change the Rate of
3		the RUS Series B Note when this debt is refinanced in 2023.
4	b.	No.
5	c.	See the response to subpart (b), above.
6	d.	See the response to subpart (a), above.
7	e.	With the exception of ECP Borrowing, all debt during the test period has been
8		executed with creditors. To change the assumptions on the interest rate
9		related to ECP borrowing, the interest rate in cell F9 of the "Debt" worksheet
10		would need to be modified.
11		
12	Witness)	Christopher A. Warren

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 168)	Please refer to the following tab and cell in the Financial forecast provided	
2	in response	to PSC 1-57: cell D3 ("Inflation") of the "O&M" tab.	
3	a.	Please state what is the function of this input in the Financial Forecast	
4		model.	
5	b.	Please state whether modifying the inflation input in D3 will flow through	
6		to modify the base period and test period results depicted on the "Stmts	
7		RUS" tab of the Financial forecast.	
8	с.	If modifying the inflation input does modify the outputs on the "Stmts RUS"	
9		tab, identify and explain each step that must be taken to achieve that result.	
10	d.	If modifying the inflation input does not modify the outputs on the "Stmts	
11		RUS" tab, explain why not.	
12	e.	If modifying the inflation input does not modify the Operating Statement	
13		outputs on the "Stmts RUS" tab, explain where and how within the	
14		Financial forecast inflation can be modified with the effects flowing	
15		through to the "Stmts RUS" tab.	
16			
17	Response)		

Case No. 2013-00199 Response to AG 1-168 Witness: Christopher A. Warren Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	a. The function for cell D3 on the "O&M" worksheet is to apply inflation	
2		amounts in the years past the current 3-4 year timeframe.
3	b.	No.
4	c. See Big Rivers' response to subpart (b), above.	
5	d.	It is only used for long-term forecasts, outside of the first 3-4 year period.
6	e.	For the short-term period, inflation factors would need to be included in the
7		information input in the Financial Model. For long-term forecasts, changing
8		the inflation rate in cell D3 will change the amounts on the "Stmts RUS"
9		worksheet in the years past the current 3-4 year timeframe.
10		
11	Witness)	Christopher A. Warren

Case No. 2013-00199 Response to AG 1-168 Witness: Christopher A. Warren Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 169)	Please provide Financial forecast "sensitivity" runs performed by Big	
2	Rivers since	August 2012 which use alternate assumptions regarding:	
3	a.	departure of smelter load;	
4	b .	debt financing;	
5	<i>c</i> .	market prices for off-system sales;	
6	d.	alternative scenarios regarding implementation of the Load Concentration	
7	Analysis and	Mitigation Plan;	
8	e.	any changes in dispatch assumptions due to units being required to operate	
9	to satisfy MISO reliability requirements from anticipated Alcan and/or Century		
10	agreements to	o purchase power from the MISO market; and/or	
11	f.	any other alternate assumptions to those contained in the financial forecast	
12	presented in	this case.	
13			
14	Response)	Big Rivers reviewed several sensitivity scenarios in conjunction with this	
15	filing. The ar	nalysis of these scenarios was conducted via the Production Cost Model rather	
16	than the Big I	Rivers Financial Model. Please see the responses to AG 1-162 and AG 1-165.	
17	a.	Big Rivers has not completed "sensitivity" runs in the Financial Model since	
18		August 2012 with alternate assumptions regarding departure of smelter load.	
			

Case No. 2013-00199 Response to AG 1-169 Witness: Christopher A. Warren Page 1 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	b.	b. Big Rivers has not completed "sensitivity" runs in the Financial Model sinc	
2		August 2012 with alternate assumptions regarding debt financing.	
3	c.	Big Rivers has not completed "sensitivity" runs in the Financial Model since	
4		August 2012 with alternate assumptions regarding market pricing for off-	
5		system sales.	
6	d.	Two sensitivity runs related to capacity market analysis were provided in	
7		response to PSC 2-14.	
8	e.	Big Rivers has not completed "sensitivity" runs in the Financial Model since	
9		August 2012 with alternate assumptions regarding any changes in dispatch	
10		assumptions due to units being required to operate to satisfy MISO reliability	
11		requirements from anticipated Alcan and/or Century agreements to purchase	
12		power from the MISO market.	
13	f.	Big Rivers has not completed "sensitivity" runs in the Financial Model since	
14		August 2012 with any other alternate assumptions to those contained in the	
15		financial forecast presented in this case.	
16			
17	Witness)	Christopher A. Warren	

Case No. 2013-00199
Response to AG 1-169
Witness: Christopher A. Warren
Page 2 of 2

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 170) Please refer to the file "Big Rivers Budget 2013 – 2016 (Confidential).xlsx"
2	as provided in response to PSC 1-57 in Case No. 2012-00535. Provide the equivalent
3	spreadsheet for this case, including all supporting documentation and associated Excel
4	spreadsheets with formulas, references and links intact.
5	
6	Response) Big Rivers objects that this request is unduly burdensome and unlikely to lead
7	to the discovery of admissible evidence for the reasons described in the response below.
8	Notwithstanding those objections, and without waiving them, Big Rivers states as follows.
9	The referenced file ("Big Rivers Budget 2013 – 2016 (Confidential).xlsx"), originally
10	provided in Case No. 2012-00535, was used as a source document for the Financial Model in
11	that proceeding. In the current rate case, this file has been replaced by the Hyperion budget
12	files that have been submitted in response to PSC 1-57. These files are now used as a source
13	document for the Financial Model. The file names are: '2014 ALCAN.xlsx', '2015
14	ALCAN.xlsx' and '2016 ALCAN.xlsx'.
15	
16	Witness) Jeffrey R. Williams

Case No. 2013-00199 Response to AG 1-170 Witness: Jeffrey R. Williams Page 1 of 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 171)	Confirm that any spreadsheets provided by Big Rivers to the Attorney
2	General will	not contain any cells or worksheets that are protected, locked, or require
3	permissions	for full operation of the spreadsheets and its inputs.
4	<i>a</i> .	If any such spreadsheets have been provided to date, please provide
5		spreadsheet copies which are unlocked/unprotected.
6		
7	Response)	To the best of Big Rivers' knowledge, it is confirmed that no spreadsheets
8	provided by	Big Rivers to the Attorney General contain any cells or worksheets that are
9	protected, loc	cked, or require permissions for full operation of the spreadsheets and its inputs.
10	It is not Big l	Rivers' intent to provide spreadsheets with protected, locked, or permission-
11	required cells	3.
12	a.	See the response above.
13		
14	Witness)	Christopher A. Warren

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

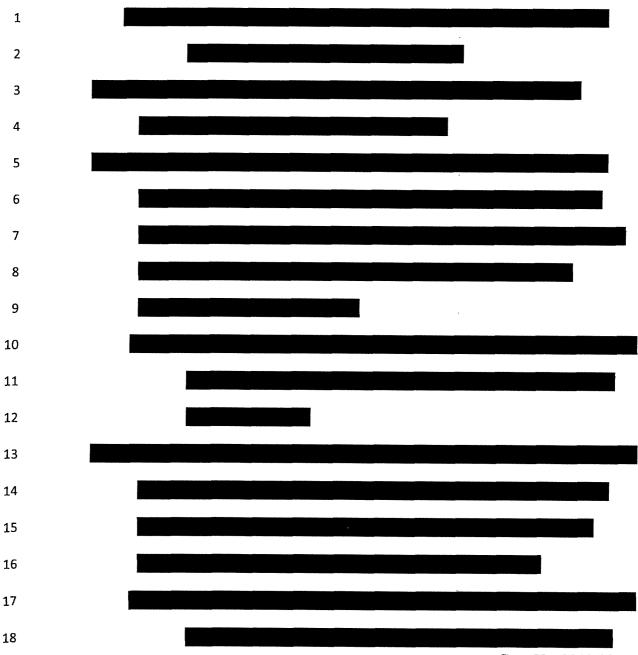
1	Item 172)	Regarding Big Rivers' response to PSC 1-57 "Big Rivers PCM Run 4-22-
2	13" Spreads	heet.
3		
4		
5		
6		
7	•	
8		
9	!	
10		
11		
12		
13		
14		
15		
16		
17		

Case No. 2013-00199 Response to AG 1-172 Witness: Robert W. Berry Page 1 of 7

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013



Case No. 2013-00199 Response to AG 1-172 Witness: Robert W. Berry Page 2 of 7

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13	Response)		
14	a.	Please	see Big Rivers' responses below.
15		i.	Please see the attached SEPA contracts.
16		ii.	SEPA costs are expected to increase primarily due to the assumption
17			that SEPA will begin including costs for the repair of Wolf Creek and

Case No. 2013-00199 Response to AG 1-172 Witness: Robert W. Berry Page 3 of 7

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		Center Hill dams in the revenue requirements when setting rates for
2		SEPA customers.
3	iii.	At the time these models were run it was assumed SEPA would remain
4		under Force Majeure through December 2014, at rates published in
5		Federal Register/ Vol. 76, No. 184 / Thursday, September 22,
6		2011/Notices pages 58790 through 58803, Wholesale Rate Schedule
7		CBR-1-H, Rate Scenario 3. Starting January 2015, assuming
8		completion of Wolf Creek dam repairs and exit from the Force
9		Majeure, Big Rivers projected rates under Wholesale Rate Schedule
10		CBR-1-H, Rate Scenario 1, would increase due to the inclusion of
11		Wolf Creek dam repair costs in SEPA rates. Starting January 2017,
12		assuming completion of Center Hill dam repairs, Big Rivers projected
13		rates under Wholesale Rate Schedule CBR-1-H, Rate Scenario 1,
14		would increase further due to inclusion of Center Hill dam repair costs
15		in SEPA rates.
16	iv.	Presently under the Force Majeure, about every other day SEPA sends
17		a schedule of power that will be delivered to Big Rivers. Big Rivers
18		may reject any portion of that schedule. Upon exiting the Force Case No. 2013-00199 Response to AG 1-172 Witness: Robert W. Berry Page 4 of 7

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		Majeu	re, on a daily basis Big Rivers will send a schedule for power to
2		SEPA	•
3		i.	Yes, but ultimately through the MISO settlement process
4			SEPA power essentially serves Big Rivers' native load.
5		ii.	No.
6	v.	SEPA	is expected to have exited the current Force Majeure. The
7		attach	ed contract describes how SEPA is billed absent a Force
8		Majeu	rre.
9		i.	See response to a.ii., above.
10		ii.	SEPA is assumed to go from run-of-the-river under Force
11			Majeure (where Big Rivers has been receiving in excess of
12			300,000 MWhs/year) to normal operations without Force
13			Majeure (where Big Rivers receives a maximum of 267,000
14			MWhs per year) under the SEPA contract.
15	vi.	It has	nothing to do with BREC's SEPA agreement. It reflects the fact
16		that th	e City of Henderson Kentucky, Municipal Power and Light
17		("HM	P&L") has its own SEPA contract that is taken into account

Case No. 2013-00199 Response to AG 1-172 Witness: Robert W. Berry Page 5 of 7

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		when determining BREC's overall off-system sales in the context of
2		BREC's contract regarding HMP&L's Station 2.
3	b.	The "City Take of HMPL Gen" is the percentage of the forecasted HMP&L
4		city load of the forecasted HMP&L units' generation.
5	c.	The Coleman units are only shown to operate in January, 2014. This can be
6		seen on the "Monthly Sources and Uses" tab.
7		i. There is no need to update PCM and financial forecasts because, in the
8		forecasted test period (Feb-14 to Jan-15), both Coleman Station and
9		Wilson Station are idled. If Coleman Station is required to operate for
10		any part of the forecasted test period due to MISO SSR requirements,
11		Coleman Station will be "net zero" to Big Rivers' financials due to the
12		Century Agreements.
13	d.	The PCM run has the Wilson Station idled in Sept-13, when the Hawesville
14		smelter contract is terminated, and the Coleman Station idled in Feb-14, when
15		the Sebree smelter contract is terminated. Big Rivers has stated in its
16		testimony in Docket 2013-00221 and 2012-00535 that the Coleman Station
17		should have been idled first but the Wilson Station was chosen due to the
18		belief that the Coleman Station would be required to operate if the Hawesville Case No. 2013-00199 Response to AG 1-172 Witness: Robert W. Berry

Page 6 of 7

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

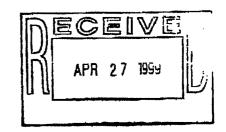
1		smelter continued operation. This belief proved true as the Coleman Station is
2		under a "must run" (SSR) status with MISO.
3		i. As stated in c., above, both stations are idled in the forecasted test
4		period. There is no need to revise the PCM or financial forecasts.
5	e.	No update is needed, as the Century Agreements do not change the financial
6		forecast.
7	f.	Big Rivers anticipates any agreements with the Sebree smelter to be similar to
8		the Century Agreements and that there will be no impact to Big Rivers'
9		financial forecast.
10		i. Big Rivers' believe any SSR agreements due to transmission system
11		reliability will have no impact on the financial forecasts.
12		
13	Witness)	Robert W. Berry

+1-270-8272101 Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-172



Department of Energy Southeastern Power Administration Elberton, Georgia 30635-2496

April 23, 1999



Mr. C. William Blackburn Vice President Power Supply Big Rivers Electric Corporation P. O. Box 24 Henderson, KY 42419-0024

Dear Mr. Blackburn:

Enclosed are two originals of Contract No. 89-00-1501-1141 between Southeastern Power Administration (SEPA) and Big Rivers Electric Corporation, which have now been executed by all parties. The two other originals will be retained in SEPA's files.

If you have any questions, please call Kim Ledbetter at 706-213-3837.

Sincerely,

Assistant Administrator for Finance and Marketing

Enclosures (2)

MAY-28-2004 03:18PM

Contract No. 89-00-1501-1141 12/15/98

CONTRACT

executed by

THE UNITED STATES OF AMERICA

acting by and through the

SOUTHEASTERN POWER ADMINISTRATION

and

BIG RIVERS ELECTRIC CORPORATION

THIS CONTRACT executed as of June 30, 1998 by and between the UNITED STATES OF AMERICA (hereinafter called the Government), Department of Energy, acting by and through the Power Administrator (hereinafter Southeastern Administrator), and BIG RIVERS ELECTRIC CORPORATION (hereinafter called the Purchaser), a cooperative corporation organized and existing under the laws of the Commonwealth of Kentucky;

WITNESSETH: That,

WHEREAS the Secretary of Energy is authorized by Section 5 of the Flood Control Act of 1944 (16 U.S.C. 825s) to transmit and dispose of electric power and energy generated at reservoir projects under the control of the Department of the Army, and the Secretary of Energy by Interim Management Directive No. 0204 dated October 3, 1977, as extended, has delegated to the Administrator his authority under said Section 5 with respect to projects then or thereafter constructed in the States of West Virginia, Virginia, North Carolina, South Carolina, Georgia, Florida, Alabama, Mississippi, Tennessee, and Kentucky; and

> Case No. 2013-00199 Attachment for Response to AG 1-172 Witness: Robert W. Berry Page 2 of 21

o.3 WHEREAS the Department of the Army has constructed reservoir projects in the Cumberland River Basin known as the Dale Hollow, Center Hill, Wolf Creek, Old Hickory, Cheatham, Barkley, J. Percy Priest, and Cordell Hull Projects (hereinafter collectively called the Cumberland Projects), together with generating facilities whose output not required in the operation of the projects shall be disposed of by the Administrator; and

- 0.4 WHEREAS on August 5, 1993, 58 F.R. 41762, the Administrator issued a written power marketing policy for the Cumberland Basin System of Projects which, among other things, designates the marketing area and specifies the allocation of power within and without the Tennessee Valley Authority (hereinafter referred to as TVA) area; and
- 0.5 WHEREAS said Section 5 of the Flood Control Act of 1944 directs that preference in the sale of such power and energy be given to public bodies and cooperatives; and
- 0.6 WHEREAS the Purchaser is a generation and transmission cooperative responsible for the power supply for the cooperatives of Green River Electric Corporation, Henderson-Union Electric Cooperative, Jackson Purchase Energy Corporation, and Meade County Rural Electric Cooperative Corporation, each of which is eligible for an allocation of Cumberland power pursuant to the aforesaid written power marketing policy, is engaged primarily in the business of selling electric power, and owns generating plants and a transmission system in the Commonwealth of Kentucky which is interconnected with TVA; and

- 0.7 WHEREAS the Administrator has entered into an agreement executed October 1, 1997, Contract No. 89-00-1501-1129 (hereinafter called Government-TVA Contract), whereby the Cumberland Projects will be operated and TVA transmission facilities will be utilized to implement the aforesaid written power marketing policy, including delivery of the Purchaser's allocation to interconnection points between the Purchaser and TVA; and
- 0.8 WHEREAS the parties hereto have agreed to sell and purchase power on the terms and conditions hereinafter set forth;

 NOW, THEREFORE, the parties hereto mutually covenant and agree as follows:

Section 1. Effective Date and Term of Contract.

This contract shall become effective and all obligations of the parties hereto with respect to the delivery of power hereunder and payment therefor shall commence at midnight, June 30, 1998, and shall continue in effect until terminated on June 30 of any year by the Purchaser upon written notice given to the Administrator not less than thirty-seven (37) months in advance of the date of termination specified therein or by the Administrator upon written notice given to the Purchaser of not less than thirty-six (36) months in advance of the date of termination specified therein; provided, that no such termination shall be effective prior to midnight, June 30, 2017. This contract shall be contingent upon the Government securing alternate arrangements for the necessary services in the event of termination or cancellation of the Government-TVA Contract.

FROM-BREC POWER SUPPLY Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-172

Section 2. Capacity To Be Made Available.

The Administrator will make available to the Purchaser and the Purchaser will accept delivery of 190,000 kilowatts of dependable capacity for the purposes specified in this contract. Of this quantity, the Purchaser agrees:

- (a) To make arrangements and deliver for the account of the Administrator 12,000 kilowatts of dependable capacity each contract year required to meet the contract demand of the Utility Commission for the City of Henderson, Kentucky (hereinafter called Henderson). Capacity deliveries shall be scheduled on a monthly basis in accordance with the provisions of Section 3.
- (b) The Administrator will make available to the Purchaser and the Purchaser will accept delivery of 178,000 kilowatts of dependable capacity for the purposes specified in this contract.

Section 3. Energy To Be Made Available.

3.1 The Administrator shall make available each contract year to the Purchaser from the Cumberland Projects through the Purchaser's interconnections with TVA and the Purchaser will schedule and accept an allocation of 1500 kilowatt-hours of energy delivered at the TVA border for each kilowatt of contract demand. For the purposes of this contract, a contract year is defined as the twelve (12) months beginning July 1 and ending at midnight June 30 of the following calendar year. The energy made available for a contract year shall be scheduled monthly such that the maximum amount scheduled in any month shall not exceed 240 hours per kilowatt of the Purchaser's contract demand and the minimum amount

FROM-BREC POWER SUPPLY +1-270-8272101 Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-172

scheduled in any month shall not be less than 60 hours per kilowatt of the Purchaser's contract demand. The Purchaser may request and the Administrator may approve energy scheduled for a month greater than 240 hours per kilowatt of the Purchaser's contract demand; provided, that the combined schedule of all of the Administrator's Other Customers (customers located outside the TVA area receiving Cumberland power) does not exceed 240 hours per kilowatt of the total contract demands of these customers; provided further, that, if at the beginning of any month hydrological conditions have caused the water elevation at Wolf Creek, Dale Hollow, or Center Hill to be less than two (2) feet above its bottom operating curve, the maximum amount available during the month shall not exceed 220 hours per kilowatt of total Other Customers contract demand. Schedules showing monthly quantities of allocated energy for the contract year shall be furnished to the Administrator's designated operating representative ten (10) days prior to the beginning of each contract year. Schedules showing monthly quantities of allocated energy for the contract year may be revised by the Purchaser at any time and schedules and revisions thereof shall become effective upon reasonable advance notice; provided, that such revised schedules shall reflect a contract year total allocation of 1500 kilowatt-hours for each kilowatt of contract demand. Revised schedules shall be furnished to the Administrator's designated operating representative.

3.2 In addition, schedules showing a breakdown of each monthly quantity into weeks shall be furnished to the Administrator's designated operating representative ten (10) days

prior to the beginning of each month. Under this contract, the seven-day week shall commence at the beginning of Sunday and extend to the end of Saturday.

- 3.3 Weekly schedules showing hourly quantities of energy to be delivered the following week shall be furnished by the Purchaser on Wednesday prior to the beginning of the week to the Administrator's designated operating representative, and energy shall be taken by the Purchaser in accordance with such hourly schedules, subject to change only if unforeseen circumstances arise which necessitate such change.
- 3.4 The energy associated with the capacity allocated to Henderson in any contract year in accordance with the provisions of Section 2 shall be scheduled by Henderson in combination with the Purchaser's schedule for delivery of the combined contract demands. Schedules showing hourly quantities of energy to be delivered shall be furnished by Henderson for each week to both the Purchaser's designated operating representative and the Administrator's designated operating representative. Energy shall be taken by Henderson in accordance with such schedules subject to changes only if unforeseen circumstances arise which necessitate such change.
- 3.5 In the event interruptions in the interconnections with TVA prevent or reduce the delivery of scheduled power, such power will be appropriately rescheduled.
- 3.6 Notwithstanding other provisions of this contract, the Purchaser will accept delivery and pay for during a contract year 1500 kilowatt-hours of energy delivered at the TVA border for

each kilowatt of contract demand, except for provisions cited in subsection 3.4.

Section 4. Points of Delivery and Characteristics of Capacity and Energy.

Electric capacity and energy supplied hereunder will be three-phase alternating current at a nominal frequency of sixty hertz and will be delivered at the Barkley Project switchyard, a delivery point in the vicinity of the Paradise steam plant, and such points of delivery as may be hereafter agreed upon by the Administrator and TVA.

Section 5. Measurement of Capacity and Energy.

Electric capacity and energy delivered hereunder to the Purchaser will be accounted for at or as of the points of delivery specified in Section 4.

Section 6. Capacity and Energy Accounting.

Capacity and energy from the Cumberland Projects under this contract shall be accounted for on the basis of capacity made available pursuant to Section 2 and energy scheduled pursuant to Section 3. Energy scheduled for any week which falls within two (2) months shall be divided between the months on the basis of the schedules furnished by the Purchaser.

Section 7. Rates for Capacity and Energy Made Available to Purchaser.

7.1 The Purchaser will pay the Government each billing month for capacity and energy made available and delivered by the Government in accordance with the wholesale power rate schedule CBR-1-C, a copy of which is attached hereto.

7.2 The rates specified in this Section 7 are subject to interim confirmation and approval by the Deputy Secretary of the Department of Energy and subject to final confirmation and approval by the Federal Energy Regulatory Commission.

The rates and charges for the sale of capacity and energy under this contract shall be subject to adjustment on July 1, 1999, and thereafter at successive intervals of one (1) year: provided that any adjusted rates or charges shall not become effective unless and until confirmed and approved on an interim basis by the Deputy Secretary of the Department of Energy and subject to final confirmation and approval by the Federal Energy Regulatory Commission; provided further, that the Government may extend any rate adjustment date up to one (1) year. The Government shall notify the Purchaser in writing at least three (3) months prior to the effective date of any proposed adjustment in rates and charges, including the amount of such proposed adjustment and the reasons therefor. The Government shall also notify the Purchaser promptly in writing of any adjustments in rates and charges when confirmed and approved by the Federal Energy Regulatory Commission. If such adjusted rates and charges result in increased costs to the Purchaser, it may cancel this contract, upon giving the Government written notice of cancellation within thirty (30) days after receipt of notice from the Government advising of such adjusted rates and charges, such cancellation shall become effective at a time specified by the Purchaser not less than one (1) year nor more than three (3) years from the effective date of the adjusted rates and charges; provided, however, that the Purchaser shall pay the

adjusted rates and charges from the date they become effective until the effective date of cancellation.

Section 8. Billing and Payments.

- 8.1 The billing month under this Contract shall end at 2400 hours C.D.T. or C.S.T., whichever is currently effective on the last day of each calendar month.
- 8.2 Bills for each month's service furnished by the Administrator under this Contract shall be mailed as soon as practicable after the end of the billing month and shall be paid on or before the twentieth day following the date of mailing.

Section 9. Nonpayment of Bills.

If the Purchaser fails to pay any amount due under this Contract within twenty (20) days from the date of mailing of applicable bills, such amount shall be considered overdue and an interest charge or charges will be added equal to the sum of (1) \$150.00 and (2) an amount calculated in the following manner: the current or other appropriate value of funds as determined by the U. S. Department of Treasury pursuant to the Treasury Fiscal Requirements Manual is to be applied on a daily basis to the unpaid portion of the bill for each day of the period from and after the due date to and including the date of payment in full.

Section 10. Service Interruptions.

10.1 No credit shall be allowed the Purchaser for any interruption or curtailment of scheduled capacity and energy delivery to the Purchaser's system for the account of the

Attachment for Response to AG 1-172

Administrator resulting from conditions on the Purchaser's power system, or for any interruption or curtailment of capacity and energy which has been planned and agreed to in advance by the operating representatives of the parties. All such agreements shall be confirmed in writing.

10.2 When capacity and energy delivery to the Purchaser's system for the account of the Administrator is reduced or interrupted and such reduction is not due to conditions on the Purchaser's system, or has not been planned and agreed to in advance, the monthly demand charge for capacity made available under Section 2 shall be reduced as to the kilowatts of such scheduled capacity which have been interrupted or reduced for each day in accordance with the following formula:

Number of kilowatts unavailable for at least 12 hours in any calendar day Monthly Capacity Charge Per KW Number of days in billing month

Section 11. Uncontrollable Forces.

Х

Neither party hereto shall be considered to be in default in respect of any obligation hereunder, if prevented from fulfilling such obligation by reason of uncontrollable forces, including but not limited to failure of facilities, flood, earthquake, storm, lightning, fire, epidemic, war, riot, civil disturbance, labor disturbance, materials or equipment shortages, fuel curtailment or shortage, or restraint by court or public authority which by exercise of reasonable diligence and foresight

Attachment for Response to AG 1-172

could not have been avoided, but excluding drought. Either party rendered unable to fulfill any obligation by reason of an uncontrollable force shall remove such inability with all reasonable dispatch.

Section 12. Provisions Relative to Employment.

During the performance of this Contract, the Purchaser agrees as follows:

- employee or applicant for employment because of race, color, religion, sex, or national origin. The Purchaser will take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to their race, color, religion, sex, or national origin. Such action shall include, but not be limited to the following: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. The Purchaser agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the contracting officer setting forth the provisions of this nondiscrimination clause.
- (b) The Purchaser will, in all solicitations or advertisements for employees placed by or on behalf of the Purchaser, state that all qualified applicants will receive

Attachment for Response to AG 1-172

consideration for employment without regard to race, color, religion, sex, or national origin.

- (c) The Purchaser will send to each labor union or representative of workers with which they have a collective bargaining agreement or other contract or understanding, a notice, to be provided by the agency contracting officer, advising the labor union or workers' representative of the Purchaser's commitment under Section 202 of Executive Order No. 11246 of September 24, 1965, and shall post copies of the notice in conspicuous places available to employees and applicants for employment.
- (d) The Furchaser will comply with all provisions of Executive Order No. 11246 of September 24, 1965, and of the rules, regulations and relevant orders of the Secretary of Labor.
- (e) The Purchaser will furnish all information and reports required by Executive Order No. 11246 of September 24, 1965, and by the rules, regulations, and orders of the Secretary of Labor, or pursuant thereto, and will permit access to their books, records, and accounts by the contracting agency and the Secretary of Labor for purposes of investigation to ascertain compliance with such rules, regulations, and orders.
- (f) In the event of the Purchaser's noncompliance with the nondiscrimination clauses of this Contract or with any of such rules, regulations, or orders, this Contract may be canceled, terminated, or suspended in whole or in part and the Purchaser may

+1-270-8272101 Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-172

be declared ineligible for further Government contracts in accordance with procedures authorized in Executive Order No. 11246 of September 24, 1965, and such other sanctions may be imposed and remedies involved as provided in Executive Order No. 11246 of September 24, 1965, or by rule, regulation, or order of the Secretary of Labor, or as otherwise provided by law.

The Purchaser will include the provisions of (q) paragraphs (a) through (g) in every subcontract or purchase order unless exempted by rules, regulations, or orders of the Secretary of Labor issued pursuant to Section 204 of Executive Order No. 11246 of September 24, 1965, so that such provisions will be binding upon each subcontractor or vendor. The Purchaser will take such action with respect to any subcontract or purchase order as the contracting agency may direct as a means of enforcing such provisions including sanctions for noncompliance; provided, however, that in the event the Purchaser becomes involved in, or is threatened with, litigation with a subcontractor or vendor as a result of such direction by the contracting agency, the Purchaser may request the United States to enter into such litigation to protect the interest of the United States.

Section 13. Notices.

Except as otherwise specified herein, any notice required or authorized by this Contract shall be deemed properly given on behalf of the Purchaser if mailed, postage prepaid, to the Administrator at the address shown on the signature page hereof,

Page 14 of 21

and on behalf of the Administrator if mailed, postage prepaid, to the official representative of the Purchaser at the address shown on the signature page hereof. The designation of the person to represent either party for such purposes or the address of such person may be changed at any time by similar notice.

Section 14. Officials Not to Benefit.

No Member of or Delegate to Congress or Resident Commissioner shall be admitted to any share or part of this Contract or to any benefit that may arise herefrom, but this restriction shall not be construed to extend to this Contract if made with a corporation or company for its general benefit.

Section 15. Waivers.

Any waiver at any time by either party hereto of its rights with respect to a default or any other matter arising in connection with this Contract shall not be deemed to be a waiver with respect to any subsequent default or matter.

Section 16. Transfer of Interest in Contract.

No voluntary transfer of this Contract or of the rights of the Purchaser hereunder shall be made without the written approval of the Secretary of Energy; provided, that any successor to or assignee of the rights of the Purchaser, whether by voluntary transfer, legislatively authorized sale, judicial sale, foreclosure sale, or otherwise, shall be subject to all the provisions and conditions of this Contract to the same extent as though such successor or assignee were the original contractor hereunder;

provided further, that the execution of a mortgage or trust deed, or judicial or foreclosure sale made thereunder, shall not be deemed voluntary transfers within the meaning of this Section 16.

Section 17. Termination of Existing Contract.

The existing contract between the Administrator and the Purchaser dated June 30, 1984, as amended, (designated as Contract No. 89-00-1501-637) will be replaced by this Contract as of its effective date; however, all liabilities accrued under the terms of the existing contract shall be preserved.

Section 18. Portability of Allocations.

18.1 Due to the uncertainty of the future of the electric utility industry with respect to power suppliers, transmission access, ancillary services, and a myriad of unresolved issues, the Administrator plans to formulate a Power Marketing Policy on the allocation and portability of Government power (hereinafter called Policy). The Policy will be developed with full public participation and review.

18.2 The Parties hereto agree that if the Policy should contain provisions contrary to contract provisions in this Contract, the Parties hereto will, where necessary, modify this Contract, or operating procedures under this Contract, to accommodate the provisions of the Policy.

Section 19. Reimbursable Work Account.

19.1 A Reimbursable Work Account may be established for operations and maintenance expenses of both the U. S. Army Corps of

Engineers and the Administrator, and improvements, replacements, and rehabilitation expenses at the Projects. The Account may be established for the Southeastern Federal Power Program, individual systems of Projects, or a portion of a system of Projects. Subsequent to a determination by the Administrator and the Corps of Engineers, if necessary, for the need for customer funding, approval for the establishment and utilization of the Account for specific purposes will be by agreement of preference customers and the Corps of Engineers. The Parties acknowledge that all Reimbursable Work Accounts will also require Budget approval by Congress, the Department of Energy, and the Office of Management and Budget.

19.2 It is acknowledged by both parties that this Section 19 may need to be adjusted to meet specific requirements of Congress in granting the Administrator permission to use Alternative Funding.

Section 20. Energy and Economic Efficiency Measures.

Each customer that purchases the Government's power is encouraged to participate in an integrated resource plan that considers both supply and demand side alternatives. It is recognized that some Government customers are members of a power supply organization that does resource planning for its customers (i.e., power supply cooperatives and joint action agencies). Where a customer, or a power supply organization that does resource planning for a Government customer, is responsible to a regulatory

body or another governmental agency for an integrated resource plan, the customer will make a copy of such integrated resource plan available to the Administrator. All Government customers shall agree to encourage the efficient use of energy by ultimate consumers.

Section 21. Contingent Upon Appropriations.

This Contract is made contingent upon Congress making available the necessary funds to enable the Administrator to carry out the provisions of this Contract. In the event such appropriation or other provision for payment is not made, this Contract shall be subject to termination or renegotiation.

IN WITNESS WHEREOF, the parties hereto have caused this contract to be executed as of the day and year first above.

UNITED STATES OF AMERICA Department of Energy

Administrator

Southeastern Power Administration

2 South Public Square

Elberton, Georgia 30635-2496

big rivers electric forporation

By John Jour

President

P. O. Box 24, 201 Third Street

Henderson, Kentucky 42420

(SEAL)

ATTEST:

Faula Mitche

17

FROM-BREC POWER SUPPLY Big Rivers Electric Corporation Case No. 2013-00199

Attachment for Response to AG 1-172

Attachment

The rate schedule below was approved on a final basis by the Faderal Energy Regulatory Commission on December 14, 1994, for the period from July 1, 1994, through June 30, 1999, in Docket Number EF94-3021-000. The rate schedule is attached to this contract to provide the current rate for capacity, energy, and additional energy. If any other language in this attached rate schedule conflicts with the main body of the contract, the language in the main body of the contract prevails.

United States
Department of Energy
Southeastern Power Administration

Wholesale Power Rate Schedule CBR-1-C

Availability:

This rate schedule shall be available to Big Rivers Electric Corporation and includes the City of Henderson, Kentucky, (hereinafter called the Customer).

Applicability:

This rate schedule shall be applicable to electric capacity and energy available from the Dale Hollow, Center Hill, Wolf Creek, Cheatham, Old Hickory, Barkley, J. Percy Priest and Cordell Hull Projects (all of such projects being hereinafter called collectively the "Cumberland Projects") and sold in wholesale quantities.

Character of Service:

The electric capacity and energy supplied hereunder will be three-phase alternating current at a nominal frequency of sixty hertz. The power shall be delivered at nominal voltages of 13,800 volts and 161,000 volts to the transmission system of Big Rivers Electric Corporation.

Points of Delivery

Capacity and energy delivered to the Customer will be delivered at points of interconnection of the Customer at the Barkley Project Switchyard, at a delivery point in the vicinity of the Paradise steam plant and at such other points of delivery as may hereafter be agreed upon by the Government and TVA.

Wholesale Power Rate Schedule CBR-1-C

Monthly Rate:

The monthly rate for capacity and energy sold under this rate schedule shall be:

Demand charge:

\$2.738 per kilowatt/month of total contract demand

Energy Charge:

None

Energy to be Furnished by the Government:

The Government shall make available each contract year to the customer from the Projects through the customer's interconnections with TVA and the customer will schedule and accept an allocation of 1,500. Rilowatt-hours of energy delivered at the TVA border for each kilowatt of contract demand. A contract year is defined as the 12 months beginning July 1 and ending at midnight June 30 of the following calendar year. The energy made available for a contract year shall be scheduled monthly such that the maximum amount scheduled in any month shall not exceed 220 hours per kilowatt of the customer's contract demand and the minimum amount scheduled in any month shall not be less than 60 hours per kilowatt of the customer's contract demand. The customer may request and the Government may approve energy scheduled for a month greater than 220 hours per kilowatt of the customer's contract demand; provided, that the combined schedule of all SEPA customers outside TVA and served by TVA does not exceed 220 hours per kilowatt of the total contract demands of these customers.

Billing Month:

The billing month for power sold under this schedule shall end at 2400 hours CDT or CST, whichever is currently effective, on the last day of each calendar month.

Conditions of Service:

The customer shall at its own expense provide, install, and maintain on its side of each delivery point the equipment necessary to protect and control its own system. In so doing, the installation, adjustment, and setting of all such control and protective equipment at or near the point of delivery shall be coordinated with that which is installed by and at the expense of TVA on its side of the delivery point.

Case No. 2013-00199 Attachment for Response to AG 1-172 Witness: Robert W. Berry Page 20 of 21

Big Rivers Electric Corporation Case No. 2013-00199 Attachment for Response to AG 1-172

Wholesale Power Rate Schedule CBR-1-C

Service Interruption:

When delivery of capacity is interrupted or reduced due to conditions on the Administrator's system beyond his control, the Administrator will continue to make available the portion of his declaration of energy that can be generated with the capacity available.

For such interruption or reduction due to conditions on the Administrator's system which have not been arranged for and agreed to in advance, the demand charge for capacity made evailable will be reduced as to the kilowatts of such capacity which have been interrupted or reduced in accordance with the following formula:

Number of kilowatts unavailable for at least 12 hours in any calendar day

Monthly capacity charge Contract demand X number of days in X 880,000 kilowatts billing month

July 1, 1994

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 173)	Explain if the Financial Model or the revenue requirements calculations of
2	Big Rivers	use some type of inflation factor, productivity factor, or other type of growth
3	factor for p	projecting amounts included in the revenue requirement. Address the following:
4	<i>a</i> .	Explain the type and source of inflation factors, productivity factors, and other
5		types of factors that are used to forecast increases or decreases in each cost in
6		the revenue requirement, and provide source documents supporting these
7		factors (i.e., factors from Department of Labor, and if it is CPI-U, GDPPI, etc.).
8	<i>b</i> .	Provide the specific inflation, productivity, and other factor that is applied to
9		each type of cost for a prior historical period, the base period (show actual and
10		forecasted amounts separately) and the forecasted test period and provide all
11		supporting documentation and calculations. Explain why the specific factor
12		was applied to each specific type of cost. Provide all supporting documentation
13		and calculations showing the specific factor multiplied by each type of cost to
14		calculate amounts included in the base period and forecasted test period.
15	с.	Provide a comparison of historical costs by cost element (payroll cost, benefits,
16		insurance, bad debts, advertising, professional costs, etc.) for the five most
17		recent actual periods 2008, 2009, 2010, 2011, and 2012 and show the amount
18		and percentage change in cost element from year to year. Explain and show
19		how the actual changes in the historical costs by cost element for each year
		Case No. 2013-00199

Response to AG 1-173

Witnesses: Billie J. Richert and Jeffrey R. Williams Page 1 of 6

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		correlates to the related inflation or productivity factor used by Big Rivers in
2		this rate case for converting historical costs (by cost element) to the base period
3		and fully forecasted test period costs. Provide supporting documentation and
4		calculations.
5	d.	Regarding (c), explain if the inflation factors used by Big Rivers in the revenue
6		and amounts for the base period and forecasted test period are supported by the
7		analysis in (c), and explain why or why not and provide supporting
8		documentation and calculations.
9	e.	Provide precedent in other cases in Kentucky where this approach of using
10		inflation factors has been accepted and has been rejected by the Commission.
11	f.	Explain if Big Rivers used these same inflation factors for the same costs in its
12		prior rate case CN 00535 and explain why or why not, and provide
13		documentation supporting the inflation factors used in the prior rate case.
14	g.	Explain if Big Rivers used any "productivity factors" or deflation factors to
15		apply to historical cost elements for purposes of arriving at base period and
16		fully forecasted test period costs, and explain why it was not reasonable to use
17		any productivity/deflation factors.
18		

Case No. 2013-00199 Response to AG 1-173

Witnesses: Billie J. Richert and Jeffrey R. Williams

Page 2 of 6

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

1	Response)	Big Rivers objects that this request is overly broad, unduly burdensome, and
---	-----------	--

- not reasonably calculated to lead to the discovery of admissible evidence. Big Rivers further 2
- objects that information pertaining to periods prior to the Unwind Transaction is not 3
- 4 available and not relevant to this matter. Notwithstanding these objections, and without
- waiving them, Big Rivers responds as follows. 5

6

7

8

9

10

11

12

13

14

15

16

17

18

a.	In its budgeting and financial planning process, Big Rivers relies to the fullest exten
	possible upon cost and pricing information provided by its suppliers, contractors,
	and/or outside service providers. Big Rivers considers this method of forecasting
	increases or decreases to its costs to be more reasonable than simply escalating
	historical values using index data or growth rates. A significant portion of Big
	Rivers' forecasted costs, including multi-year contracts with specified pricing, are
	determined in this manner. This is the case for a substantial portion of O&M and
	capital costs at the plants (e.g. maintenance, materials and supplies), outside
	professional services, bargaining unit employee compensation, and other A&G
	expenses. Vendor proposals, price quotes, and existing contracts are relied upon to
	establish the forecasted costs in these instances. In areas where specific cost
	information is unavailable, Big Rivers researches industry-related studies and
	publications to assist in determining reasonable escalation parameters. Examples

Case No. 2013-00199 Response to AG 1-173

Witnesses: Billie J. Richert and Jeffrey R. Williams

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

include but are not limited to (i) J.D. Energy Publications and ACES information for
the process of negotiating long-term coal contracts, (ii) the USGS Mineral Yearbook
for information related to pricing for lime reagent materials, (iii) the Corn Belt index
for information related to pricing for ammonia, and (iv) the NRECA G&T Managers
Association and CPI for compensation-related information utilized to help with
bargaining unit contract negotiations and non-union pay increases. (Note that the
aforementioned resources are relied upon by Big Rivers in the forecasting process,
but are not strictly applied as escalation factors in each case, so reconciliation to
particular accounts is not possible.) Additionally, the load forecast (which is used in
the production cost model, Big Rivers Financial Model, and the cost of service study
in this proceeding) relies on assumptions for growth in the number of households,
employment, gross national product, average income per household, retail sales,
inflation, and heating and cooling degree days. These assumptions are used in the
econometric models used by GDS Associates, Inc. to develop the Big Rivers 2013
Load Forecast, as described in the CONFIDENTIAL attachments provided in
response to AG 1-139. Big Rivers relies upon management experience to project cost
increases for any items for which contract specifications, supplier pricing, market
data, industry trends or other third party information is not readily available. This

Case No. 2013-00199
Response to AG 1-173

Witnesses: Billie J. Richert and Jeffrey R. Williams Page 4 of 6

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1		approach is repeated each year when the budgeting process begins for the upcoming
2		budget and financial planning period.
3	b.	Please see the response to part (a).
4	c.	Please see AG 1-62 for budget variance reports for fiscal years ending 12/31/2012,
5		12/31/2011 and 12/31/2010. For additional information regarding historical costs,
6		please see the following items containing responses to the Commission Staff's Initial
7		Request for Information in the instant case: 29 (a & b), 32, 34, 41, 42, 43, 46, 47, 50
8		54, and 56(b). Otherwise, the requested information does not exist; please see the
9		response to part (a).
10	d.	Please see the response to parts (a) and (c).
11	e.	This request seeks legal research, not data. Big Rivers objects that this request seeks
12		information subject to the attorney-client and attorney work product privileges.
13	f.	The method Big Rivers used to develop its forecasts in Case No. 2012-00535 was
14		described in the Direct Testimony of DeAnna M. Speed in that proceeding. The
15		approach with respect to inflation factors in that case was the same approach used in
16		this case. Please see the response to part (a).
17	g.	Please see the response to part (a).
18		

18

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's **Initial Request for Information** dated August 19, 2013

September 3, 2013

Billie J. Richert and Jeffrey R. Williams Witnesses) 1

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 174)	Referencing the Direct Testimony of John Wolfram p. 34, l.2 to l.5, please
2	provide the f	ollowing:
3	a.	Background calculations and assumptions used to arrive at a distribution
4		system cost adder of \$0.033 per kWh for all the distribution cooperatives;
5		and
6	b.	Actual distribution system cost adders for each of the distribution
7		cooperatives.
8		
9	Response)	
10	a.	The distribution system cost adder was estimated by comparing the Members'
11		average rural revenue in cents per kWh with their average cost of purchased
12		power in cents per kWh, as noted on the Members' RUS Form 7 reports for
13		2011 and 2012. Please see the attachment.
14	b.	Please see the attachment.
15		
16	Witness)	John Wolfram

Attachment for Response to AG 1-174 Estimate of Distribution System Cost Adder

2011					
	Total Cost of Purchased Power	kWh Purchased	\$/kWh		
	(RUS Form 7, Part K, Column F)	(RUS Form 7, Part K, Column E)			
Meade	19,772,602	480,251,350	0.041		
ЛР	27,759,591	683,757,836	0.041		
Kenergy	387,543,341	9,449,690,476	0.041		
Total	435,075,534	10,613,699,662	0.041		
Rural Customers	Revenue	kWh Sold	\$/kWh	Adder	
	(RUS Form 7, Part O, Column C)	(RUS Form 7, Part O, Column C)			
Meade	27,479,674	364,735,373	0.075	0.034	
ЛР	29,070,144	411,230,492	0.071	0.030	
Kenergy	56,283,522	754,123,824	0.075	0.034	
Total	112,833,340	1,530,089,689	0.074	0.033	

2012				
	Total Cost of Purchased Power	kWh Purchased	\$/kWh	
	(RUS Form 7, Part K, Column F)	(RUS Form 7, Part K, Column E)		
Meade	20,783,865	465,661,930	0.045	
ЛР	29,783,789	668,863,581	0.045	
Kenergy	456,369,581	9,782,022,935	0.047	
Total	506,937,235	10,916,548,446	0.046	
Rural Customers	Revenue	kWh Sold	\$/kWh	Adder
	(RUS Form 7, Part O, Column C)	(RUS Form 7, Part O, Column C)		
Meade	27,769,525	346,401,726	0.080	0.036
JP	31,043,685	395,868,914	0.078	0.034
Kenergy	58,093,381	723,477,955	0.080	0.034
Total	116,906,591	1,465,748,595	0.080	0.033

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

Response to the Office of the Attorney General's Initial Request for Information dated August 19, 2013

September 3, 2013

1	Item 175)	Referencing the Exhibit Wolfram-5 please explain the difference between		
2	the Rural and the Large Industrial Customer Class rates for FAC, Non-Smelter Non-FAC			
3	PPA, and Surcredit.			
4				
5	Response)	The differences between the Rural and Large Industrial customer class rates		
6	for FAC, Non	a-Smelter Non-FAC PPA, and Surcredit are all approximately 1% and result		
7	from rounding	g. Absent rounding, the values for these billing factors should be the same for		
8	the Rurals and	d the Large Industrials.		
9				

10 Witness) John Wolfram