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OCT 12 2018

PUBLIC SERVICE  
COMMISSION

**VIA OVERNIGHT MAIL**

October 11, 2018

Gwen R. Pinson, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

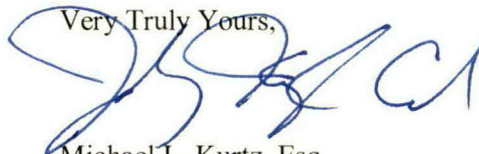
***Re: Case Nos. 2017-00384***

Dear Ms. Pinson:

Please find enclosed the original and ten (10) copies of the COMMENTS OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. for filing in the above-referenced matter.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

MLKkew  
Attachment  
cc: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail (when available) or by regular, U.S. mail, unless otherwise noted, this 11<sup>th</sup> day of October, 2018 to the following:



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OCT 12 2018

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

In The Matter Of The Application Of: The 2017 Integrated Resource Plan of Big Rivers Electric Corporation : Case No. 2017-00384  
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**COMMENTS OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

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Kentucky Industrial Utility Customers, Inc. (“KIUC”) hereby submits its Comments in the above-captioned proceeding. The members of KIUC who are served by Big Rivers Electric Corporation (“Big Rivers” or “Company”) through Kenergy Corp. include some of the utility’s biggest customers, specifically: Domtar Paper Co., LLC and Kimberly Clark Corporation.

When it moved to intervene in this proceeding, KIUC raised a number of concerns regarding the details surrounding Big Rivers’ 2017 Integrated Resource Plan (“IRP”), including: 1) the status of the idled Coleman generating facility and any environmental upgrades needed to restart that facility; 2) the impact on environmental and other costs of Big Rivers’ long-term sales to the Nebraska utilities, Missouri municipal utilities, and to the Kentucky Municipal Energy Agency; 3) the financial implications of the retirement of Coleman; and 4) projected rate changes on native load customers, including assumptions about the disposition of the depreciation deferral. KIUC served discovery on Big Rivers related these concerns on June 21, 2018, to which the Company responded on July 20, 2018.

On September 26, 2018, Big Rivers submitted a Settlement Agreement, Stipulation, and Recommendation in Case No. 2018-00146 (“Settlement”) signed by KIUC and the Kentucky Attorney General, which would generally resolve the concerns raised by KIUC in this proceeding. Accordingly, in light of Big Rivers’ discovery

responses and, more importantly, given the pending Settlement, KIUC does not object to approval of Big Rivers' 2017 IRP in this proceeding.

Respectfully submitted,

A handwritten signature in blue ink that reads "Michael L. Kurtz" with a small flourish at the end. The signature is written over a horizontal line.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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**COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY  
CUSTOMERS, INC.**

October 11, 2018