

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF BIG	)	
RIVERS ELECTRIC CORPORATION AND	)	CASE NO.
KENERGY CORP. TO IMPLEMENT A NEW	)	2021-00289
STANDBY SERVICE TARIFF	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.

Big Rivers Electric Corporation (BREC) and Kenergy Corp. (Kenergy) pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 3, 2021. The Commission directs BREC and Kenergy to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

BREC and Kenergy shall make timely amendment to any prior response if BREC and Kenergy obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which BREC and Kenergy fail or refuse to furnish all or part of the requested information, BREC and Kenergy shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, BREC and Kenergy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, proposed tariff LICSS – Large Industrial Customer Standby Service (LICSS), Sheet No. 69. Explain whether this tariff applies to counterparties of BREC’s three solar power purchase agreements.

2. Refer to the Application, proposed tariff LICSS, Sheet Nos. 69–69.01 and to the Direct Testimony of Mark J. Eacret, page 17, lines 1–13, in Case No. 2021-00282.<sup>2</sup> Provide in Excel format with all formulas, columns, and rows unprotected and fully

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<sup>2</sup> Case No. 2021-00282, *Electronic Tariff Filing of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation for Approval and Confidential Treatment of a Special Contract and Cost Analysis Information and a Request for Deviation from the Commission’s September 24, 1990 in Administrative Case No. 327* (filed June 21, 2021).

accessible BREC's monthly estimate of the energy and capacity requirements it would have to supply for those large industrial customers who are or potentially may be standby customers and who may subscribe to one or all of the services to be offered through LICSS for the period 2022–2026. Include with the response BREC's Midcontinent Independent System Operator (MISO) capacity requirements and BREC's capacity position and reserve margin including transmission losses and the PPAs when they come online.

3. Refer to the Application, proposed Tariff LICSS, Sheet No. 69.03–69.04. Provide a numerical billing example of an industrial customer for which maintenance and back-up service is provided during a month.

4. Refer to the Application, Direct Testimony of John Wolfram, page 4, lines 11–13. Confirm that the provision requiring the standby customer to pay the higher of the standard LIC tariff energy charge or market for all Maintenance Power and Backup Supply Power energy usage is only in the Maintenance Power Service and Backup Power Service section of Tariff LICSS.



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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED AUG 18 2021

cc: Parties of Record

\*J. Christopher Hopgood  
Dorsey, Gray, Norment & Hopgood  
318 Second Street  
Henderson, KENTUCKY 42420

\*Big Rivers Electric Corporation  
201 Third Street  
P. O. Box 24  
Henderson, KY 42420

\*Gregory Mayes  
Big Rivers Electric Corporation  
201 Third Street  
P. O. Box 24  
Henderson, KY 42420

\*Senthia Santana  
Big Rivers Electric Corporation  
201 Third Street  
P. O. Box 24  
Henderson, KY 42420

\*Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Tyson Kamuf  
Corporate Attorney  
Big Rivers Electric Corporation  
201 Third Street  
P. O. Box 24  
Henderson, KY 42420

\*Honorable Kurt J Boehm  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Kenergy Corp.  
6402 Old Corydon Road  
P. O. Box 18  
Henderson, KY 42419

\*Kenergy Corp.  
Kenergy Corp.  
6402 Old Corydon Road  
P. O. Box 18  
Henderson, KY 42419

\*Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202