

1 3. “Domtar” means Domtar Paper Company, LLC and the agents, officer,
2 directors, and employees of Domtar Paper Company, LLC.

3 4. “Kimberly-Clark” means Kimberly-Clark Corporation and the agents,
4 officers, directors, and employees of Kimberly-Clark Corporation.

5 5. “KIUC,” “you,” or “your” means Kentucky Industrial Utility Customers,
6 Inc., Domtar, Kimberly-Clark, and the members, agents, officers, directors,
7 employees, and consultants of KIUC, Domtar, or Kimberly-Clark.

8 6. “Document” means any written, recorded, transcribed, printed or
9 impressed matter of whatever kind, however produced, stored or reproduced,
10 including, but not limited to, sound or pictorial recordings, computerized information,
11 books, pamphlets, letters, memoranda, telegrams, electronic or mechanical
12 transmissions, communications of all kinds, reports, notes, working papers,
13 handwritings, charts, papers, writings, printings, transcriptions, tapes and records
14 of all kinds. Document includes, without limitation, all workpapers produced by or
15 relied upon by any witness.

16 7. “LIC” means the entities provided energy by Big Rivers pursuant to its
17 Large Industrial tariff.

18 8. “Members” means Jackson Purchase Energy Corporation, Kenergy
19 Corp., and Meade County Rural Electric Cooperative Corporation.

20 9. “Person” includes a natural person, a business organization of any type,
21 an unincorporated association, a governmental subdivision, agency, or entity, and a
22 business trust.

1 10. Wherever in these information requests you are asked to “identify,” you
2 are requested:

3 a. when identifying a person, to give such person’s:

- 4 i. full name,
- 5 ii. business address, residence address, and telephone number,
- 6 iii. his or her present or last known position and business affiliation
7 at the time in question; and
- 8 iv. the nature of such person’s participation in, and the scope of his
9 responsibility with regard to, the facts and events underlying the
10 present case;

11 b. when identifying an oral communication, to:

- 12 i. identify the author thereof and the parties thereto,
- 13 ii. state the date of the communication,
- 14 iii. state the place of the communication,
- 15 iv. state the substance of the communication, and
- 16 v. state whether such communication has been reduced to writing
17 and, if so, identify each document and the present custodian
18 thereof;

19 c. when identifying other information, to state:

- 20 i. the source thereof,
- 21 ii. any oral communications pertaining thereto,
- 22 iii. any documents pertaining thereto, and

- 1 c. The date, author or authors, addresses or addresses, and distribution of
- 2 the Document;
- 3 d. Each person in whose possession, custody or control any copy of the
- 4 Document is or has been; and
- 5 e. Paragraph number of the schedule of Documents to which the Document
- 6 or part of the Document is responsive.

7 2. If, for reasons other than a claim of privilege or work product, you refuse
8 to answer any data request or to produce any Document requested, state the grounds
9 upon which the refusal is based with sufficient specificity to permit a determination
10 of the propriety of such refusal.

11 3. If any copy of any Document requested herein or any record which refers
12 or relates to any Document requested herein has been destroyed or lost, set forth to
13 the extent possible the content of each such Document, the date such Document and
14 its copies were destroyed or lost and, if destroyed, the identity of the person
15 authorizing such destruction, and the identity of the last known custodian of such
16 Document prior to its destruction.

17 4. These data requests shall be deemed continuing and you should serve
18 upon Big Rivers' counsel (1) supplemental responses to these data requests if
19 additional information or information that changes your response to any data request
20 is obtained during the course of this proceeding, and (2) any documents requested
21 herein that become available or that are discovered after the date your responses to
22 these data requests are due.

1 DATA REQUESTS

2 1. Please provide an electronic spreadsheet copy of Exhibit SJB-2 to the
3 Direct Testimony of Stephen J. Baron, complete with all formulas intact, including
4 all referenced cells and data.

5 2. Please provide an electronic spreadsheet copy of Exhibit SJB-3 to the
6 Direct Testimony of Stephen J. Baron, complete with all formulas intact, including
7 all referenced cells and data.

8 3. Please provide an electronic spreadsheet copy of Exhibit SJB-4 to the
9 Direct Testimony of Stephen J. Baron, complete with all formulas intact, including
10 all referenced cells and data.

11 4. Does KIUC support Big Rivers' maintaining an annual TIER of at least
12 1.30?

13 5. Does KIUC believe it is in the best near-term and long-term interests of
14 Big Rivers and its Members to maintain a TIER of at least 1.30?

15
16 This 11th day of May, 2020.

17 Respectfully submitted,

18 **BIG RIVERS ELECTRIC CORPORATION**

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1 **DINSMORE & SHOHL LLP**

2
3 /s/ Edward T. Depp

4 Edward T. Depp
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16 *Counsel to Big Rivers Electric Corporation*
17

18 **Certification**

19 I hereby certify that the electronic version of this filing made with the
20 Commission on May 11, 2020, is a true and accurate copy of the paper document that
21 will be submitted to the Commission within 30 days of the Governor lifting the state
22 of the emergency pursuant to the Commission's Orders in Case No. 2020-00085, and
23 the electronic version of the filing has been transmitted to the Commission. A copy of
24 this filing has been served electronically on all parties of record for whom an email
25 address is given in the online Service List for this proceeding, and there are currently
26 no parties that the Commission has excused from participation by electronic means.
27

28
29 /s/ Edward T. Depp

30 *Counsel to Big Rivers Electric Corporation*