

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: Electronic Tariff Filing of Big Rivers :  
Electric Corporation and Kenergy Corporation to Implement : Case No. 2021-00289  
a New Standby Tariff :  
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**KIMBERLY-CLARK CORPORATION**  
**FIRST SET OF DATA REQUESTS**  
**TO**  
**BIG RIVERS ELECTRIC CORPORATION**  
**AND**  
**KENERGY CORPORATION**

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Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.  
**BOEHM, KURTZ & LOWRY**  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
Ph: (513) 421-2255 Fax: (513) 421-2764  
E-Mail: [MKurtz@BKLawfirm.com](mailto:MKurtz@BKLawfirm.com)  
[KBoehm@BKLawfirm.com](mailto:KBoehm@BKLawfirm.com)  
[JKylerCohn@BKLawfirm.com](mailto:JKylerCohn@BKLawfirm.com)  
**COUNSEL FOR KIMBERLY-CLARK  
CORPORATION**

Dated: August 20, 2021

## DEFINITIONS

1. "Document(s)" is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, memoranda, reports, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.
2. "Correspondence" is used in its customary broad sense and includes electronic email, including all attachments, and all written mail, messages and communications between the persons or parties named in the request.
3. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final, and whether or not referred to in Big Rivers and Kenergy's direct testimony.
4. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.
5. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
6. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
7. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
8. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
9. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
10. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
11. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
12. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
13. "BREC" or "Big Rivers" means Big Rivers Electric Corporation and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kimberly-Clark Corporation. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

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Q.1-1. Refer to the Direct Testimony of John Wolfram, pp.3-4. *“The credit is based on the value of capacity described by Big Rivers in its recent filing regarding the conversion of the Green Station units to natural gas in Case No. 2021-00079. See In the Matter of: Electronic Application Of Big Rivers Electric Corporation For A Certificate Of Public Convenience And Necessity Authorizing The Conversion Of The Green Station Units To Natural Gas Fired Units And An Order Approving The Establishment Of A Regulatory Asset, filed February 28, 2021. In that filing, Big Rivers describes the capacity price projections in the Direct Testimony of Mark Eacret on pages 9-12 and in Eacret Exhibit 3.”*

- a. Please provide an unredacted copy of Mark Eacret’s referenced testimony, including Exhibit 3.
- b. Does BREC believe that the cost to convert the Green Station units to natural gas represents BREC’s marginal cost of capacity?
  - i. Please explain why or why not.
- c. What is BREC’s embedded cost of generation capacity?
  - i. Please provide all supporting workpapers, in Excel format with working formulas.
- d. What is BREC’s embedded cost of generation capacity?
  - i. Please provide all supporting workpapers, in Excel format with working formulas.

Q.1-2. Refer to *Docket No. 2021-00061 Electronic Application Of Big Rivers Electric Corporation For Review Of Its Mrsm Charge For Calendar Year 2020*, Application, p. 10. “In further compliance with the Commission’s June 25, 2020, Order in Case

No. 2020-00064, Big Rivers gives notice of filing two fully–allocated cost of service studies based upon the NARUC-approved methods.”

- a. Please provide the referenced cost of service studies, in Excel format with working formula.
- b. Please indicate whether BREC has any updates to its cost of service studies that should be recognized in this proceeding. If BREC has updates, please provide a copy of the updated cost of service study, in Excel format with working formula.
- c. According to BREC’s cost of service studies, what is the embedded unit cost of generation capacity for Large Industrial Customers?
  - i. Please explain in detail how the unit cost is derived from the cost of service study and provide all supporting workpapers and calculations, in Excel format with working formula where applicable.
- d. According to BREC’s cost of service studies, what is the embedded unit cost of transmission capacity for Large Industrial Customers?
  - i. Please explain in detail how the unit cost is derived from the cost of service study and provide all supporting workpapers and calculations, in Excel format with working formula where applicable.
- e. Are loads from the planned Nucor facility in Bradenburg, Meade County, Kentucky, incorporated into BREC’s cost of service studies?
  - i. If yes, please explain how.
- f. The Sebree smelter and the Hawesville smelter departed BREC’s system resulting in an approximate loss of 850 MW of native load. Does BREC currently provide transmission service to the smelters?
  - i. If yes, please explain how the transmission service costs to serve the smelters is reflected in BREC’s cost of service studies.

Q.1-3. What planning reserve margin does BREC plan for to meet its peak demand requirements?

Q.1-4. Please provide 8760 hourly load data for BREC’s members for the most recent annual time period over which BREC has the requested data available. Please provide the data in Excel format.

Q.1-5. Please provide 8760 hourly generation data for each of BREC's generation resources for the most recent annual time period over which BREC has the requested data available. Please provide the data in Excel format.

Respectfully submitted,

/s/ Kurt J. Boehm

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [MKurtz@BKLLawfirm.com](mailto:MKurtz@BKLLawfirm.com)

[KBoehm@BKLLawfirm.com](mailto:KBoehm@BKLLawfirm.com)

[JKylerCohn@BKLLawfirm.com](mailto:JKylerCohn@BKLLawfirm.com)

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August 20, 2021