

**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 :
:

**KIMBERLY-CLARK CORPORATION
SECOND SET OF DATA REQUESTS
TO
BIG RIVERS ELECTRIC CORPORATION
AND
KENERGY CORPORATION**

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Dated: September 17, 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.

**KIMBERLY-CLARK CORPORATION
SECOND SET OF DATA REQUESTS TO
BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORPORATION
CASE NO. 2021-00289**

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a New Standby Tariff :

- Q.2-1. Please refer to Big Rivers response to KC 1-1 c. i., Attachment KC 1-1 (JW Att3 CNF) – Big Rivers_COSS_2019_FILED, tab ‘Alloc-Opt1.’
- a. Please confirm the net embedded cost of generation capacity for the LIC class is \$14.2541/kW per unit 12 CP.
 - i. If not, please provide the correct cost of generation capacity in \$/kW per unit 12 CP.
 - b. Please confirm the net embedded cost of generation capacity for the LIC class is \$12.3359/kW per unit of individual LIC customer monthly kW demands. This rate is equal to the LIC Net Production Rate Rev Req of \$21,832,407 divided by the 1,769,832 sum of the individual customer kW demands for the LIC class.
 - i. If not, please provide the correct cost of generation capacity in \$/kW per unit of individual LIC customer monthly kW demands.
 - c. Please confirm the net embedded cost of transmission capacity for the LIC class is \$5.9188/kW per unit 12 CP.
 - i. If not, please provide the correct cost of generation capacity in \$/kW per unit 12 CP.
 - d. Please confirm the net embedded cost of transmission capacity for the LIC class is \$5.1223/kW per unit of individual LIC customer monthly kW demands. This rate is equal to the LIC Net Production Rate Rev Req of \$9,065,653 divided by the 1,769,832 sum of the individual customer kW demands for the LIC class.
 - i. If not, please provide the correct cost of generation capacity in \$/kW per unit of individual LIC customer monthly kW demands.

Q.2-2. Please refer to Big Rivers response to KC 1-1 c. i., Attachment KC 1-1 (JW Att3 CNF) – Big Rivers_COSS_2019_FILED, tab ‘Alloc-Opt1,’ and Big Rivers response to KC 1-2 f.

Big Rivers’ response to KC 1-2 f states that “*transmission service to the smelters is provided by MISO. MISO invoices a third-party energy manager operating as market participant on behalf of the smelters. Big Rivers, as the transmission owner, receives some of that revenue from MISO.*”

Big Rivers response to KC 1-1 c. i., Attachment KC 1-1 (JW Att3 CNF) – Big Rivers_COSS_2019_FILED, tab ‘Alloc-Opt1’ shows transmission revenues of \$14,882,739 from HMPL Joint Pricing Zone, Century Sebree and Century Hawesville.

18	<u>Transmission Revenue</u>		
19	HMPL Joint Pricing Zone		\$ (1,568,113)
20	Century Sebree		\$ 7,664,958
21	Century Hawesville		\$ 8,785,894
22			\$ 14,882,739

- a. As a transmission owner, please explain in detail how Big Rivers receives compensation from the MISO for transmission service provided on Big Rivers transmission facilities?
 - i. What are the rates at which Big Rivers receives revenue from the MISO for transmission service provided on Big Rivers owned transmission facilities?
- b. Please clarify whether the transmission revenue that is shown in Att3 as an offset to the Big Rivers retail transmission revenue requirement is received directly from Century Sebree and Century Hawesville, or from MISO?
- c. What transmission rates do the smelters pay for transmission service?
 - i. Please provide supporting workpapers and analyses.
- d. What proportion of the transmission costs paid by the smelters to MISO does Big Rivers receive from MISO as a transmission owner?
 - i. Please provide supporting workpapers and analyses.
- e. Does Big Rivers receive any additional transmission revenues from MISO?
 - i. Please provide supporting workpapers and analyses.
- f. Please explain what are the HMPL Joint Pricing Zone negative transmission revenues?

Q.2-3. Please refer to Big Rivers response to KC 1-1 c. i., Attachment KC 1-1 (JW Att3 CNF) – Big Rivers_COSS_2019_FILED, tab ‘Alloc-Opt1,’ and ER21-1240 Big Rivers 2021 Informational Filing for Formula Rate Update.¹

- a. In Attachment A, page 1, line 17 of the 2021 Information Filing for Formula Rate Update, the Network and Point to Point transmission rate is shown to be \$1.615/kW/Mo.
 - i. Does this \$1.615/kW/Mo rate represent the rate at which Big Rivers receives compensation from the MISO for transmission service provided on Big Rivers transmission facilities?
 1. If not, please explain in detail, and at what rates, Big Rivers does receive compensation from the MISO.
 - ii. Please explain in the detail the reason why this rate differs from the \$5.9188/kW per unit 12 CP cost in Big Rivers’ COSS?
 - iii. Please provide supporting workpapers or calculations to reconcile the difference between these two rates for transmission service.
- b. Does Big Rivers have a different transmission cost of service for wholesale customers relative to the transmission cost of service retail customers on a per unit basis?
 - i. Please explain in detail why or why not.
 - ii. If the transmission cost of service is the same for wholesale and retail customers on a per unit basis, please explain why the Network and Point to Point transmission rate is different than the embedded transmission cost of service.

Q.2-4. Refer to Big Rivers’ Excel Attachment KC 1-1 (JW Att3 CNF) – Big Rivers_COSS_2019_FILED to Response KC 1-1, tab ‘Rates-Opt1.’

- a. The workpaper indicates that the LIC cost-based demand charge is 16.452/kW-Mo. Please provide workpapers or analyses showing the derivation of this cost-based rate using the results of the cost-of-service study.
- b. Please explain the reasons why Big Rivers’ current LIC demand charge of \$10.715/kW-Mo differs from the cost-based rate?
- c. Does Big Rivers believe it is appropriate to utilize a top-down rate design for the LICSS tariff, starting with the LIC rates if the LIC rates are not cost-based?
 - i. Please explain why or why not.

¹ [Big Rivers 2021 Informational Filing for Formula Rate Update.](#)

Q.2-5. Refer to Big Rivers' response to KC 1-4. Please provide similar 8760 hourly load data broken out between the RDS class and the LIC class.

Q.2-6. Refer to Big Rivers' response to PSC 1-2. *"Paper Excellence (formerly Domtar) and Kimberly Clark Corporation are the only two large industrial members of which Big Rivers is aware who potentially may subscribe to one or all of the services to be offered through the proposed LICSS tariff for the period 2022-2026."*

- a. Please explain why Big Rivers believes these two customers are the only LIC customers who may potentially take service under the LICSS tariff.

Respectfully submitted,

/s/ Kurt J. Boehm

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