

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

IN THE MATTER OF:

Electronic Tariff Filing of Big Rivers Electric
Corporation and Kenergy Corp. to Revise the Large
Industrial Customer Standby Service Tariff.

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Case No. 2023-00312

**SUPPLEMENTAL DISCOVERY REQUESTS OF
DOMTAR PAPER COMPANY, LLC TO
BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.**

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COMPANY, LLC**

Dated: November 13, 2023

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’ 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.
14. "Kenergy" or means Kenergy Corp. and/or any of its 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 Domtar Paper Company, LLC. 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.2-1. Refer to Big Rivers’ response to Domtar 1-2(b).
- a. Is it Big Rivers’ position that it does not know the base amount of fuel included in its own tariff LIC?
 - b. Is it correct that the FAC assumes that the base amount of fuel in tariff LIC is \$0.020932 per kWh? If this is not correct, please fully explain your response.
- Q.2-2. Please provide the updated cost of service studies in electronic format (Excel) with all formulas intact referred to in Big Rivers’ response to Domtar 1-3. Also include all supporting workpapers, including all Excel workbooks used to develop each study.
- Q.2-3. Refer to Big Rivers’ response to Domtar 1-6. For each of the standby tariffs that Big Rivers’ reviewed, as listed in its response to Domtar 1-6, please identify the reasons that Big Rivers did not consider such standby tariff applicable to Big Rivers. In particular, please explain why Big Rivers’ did not use the approach approved by the Commission for Duke Energy Kentucky.
- Q.2-4. Refer to Big Rivers’ response to Domtar 1-7. Please explain what Big Rivers means by the following statement: “Upon determining its approach, Big Rivers developed the filed rate schedule.” In particular what does “upon determining its approach” mean.
- Q.2-5. Refer to Big Rivers’ response to Domtar 1-5. Please provide a narrative explaining the steps that Big Rivers undertook to determine that no other utilities have standby and maintenance tariffs similar to Big Rivers’ proposed LICSS.
- Q.2-6. Refer to Big Rivers’ response to Domtar 1-4. Please provide a description of the specific experience of Mr. Wolfram in the development of a standby and maintenance power rate. Include case or docket numbers of regulatory proceedings that Mr. Wolfram has testified in on the subject of standby and maintenance power rates.

- Q.2-7. Refer to Big Rivers' response to Domtar 1-4. Please provide a description of the specific experience of each of the individuals listed in response to Part (a) with regard to the development of a standby and maintenance power rate. Include case or docket numbers of regulatory proceedings that each individual has testified in on the subject of standby and maintenance power rates.
- Q.2-8. Refer to Big Rivers' response to Domtar 1-16. Please confirm that Big Rivers is unable and/or unwilling to provide to Domtar or the Kentucky Public Service Commission the impact of its LICSS rate proposal on Domtar, a standby and maintenance power customer of Big Rivers. If Big Rivers can provide the requested information, please provide it together with all assumptions and supporting workpapers.
- Q.2-9. Refer to Big Rivers response to Domtar 1-16. Does Big Rivers believe that it is reasonable to propose an entirely new tariff that would be applicable to existing customers without providing any information regarding the impact of its proposed tariff on the impacted customers? If Big Rivers believes that it is reasonable to do so, please provide an explanation supporting its response. In particular, how does Big Rivers believe that the Kentucky PSC should evaluate its proposal without providing any estimated impact on the Domtar, who has taken standby and maintenance power for Big Rivers for many years?

Respectfully submitted,

/s/ Michael L. Kurtz

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