

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

In the Matter of:)	
)	
ELECTRONIC TARIFF FILING OF BIG RIVERS)	CASE NO.
ELECTRIC CORPORATION AND KENERGY)	2023-00312
CORP. TO REVISE THE LARGE INDUSTRIAL)	
CUSTOMER STANDBY SERVICE TARIFF)	

**KIMBERLY-CLARK CORPORATION'S SUPPLEMENTAL
INFORMATION REQUESTS TO BIG RIVERS ELECTRIC
CORPORATION AND KENERGY CORP.**

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Date: November 13, 2023

INTRODUCTION

Pursuant to 807 KAR 5:001(12), and consistent with the Kentucky Public Service Commission's ("Commission") September 27, 2023 Order, Intervenor Kimberly-Clark Corporation ("Kimberly-Clark") hereby files this supplemental set of requests for information from Big Rivers Electric Corporation ("BREC") and Kenergy Corp ("Kenergy"). Pursuant to the Commission's September 27, 2023 Order, the requested information is separately due from BREC and from Kenergy no later than November 27, 2023.

DEFINITIONS

1. "BREC" or "Big Rivers" means Big Rivers Electric Corporation and/or any of its officers, directors, employees, or agents who may have knowledge of the particular matter addressed. As used herein, "BREC" or "Big Rivers" shall also encompass Kenergy (as defined in paragraph 2 below), unless specifically stated otherwise.
2. "Kenergy" means Kenergy Corp. and/or any of its officers, directors, employees, or agents who may have knowledge of the particular matter addressed.
3. "Document(s)" is used in its customary broad sense and includes electronic mail ("e-mail") and all written, typed, printed, electronic, computerized, recorded, or graphic statements, memoranda, reports, communications, or other matter, however produced or reproduced, whether or not now in existence, or in the possession of either or both Respondents.
4. "Correspondence" is used in its customary broad sense and includes e-mail, including all attachments, and all written mail, messages and communications between the persons or parties named in the request.
5. "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 BREC or Kenergy's direct testimony.

6. 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.
7. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise, or legal entity.
8. 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.
9. 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, or 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.
10. 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.
11. "And" and "or" should be considered both conjunctive and disjunctive, unless specifically stated otherwise.
12. "Each" and "any" should be considered both singular and plural, unless specifically stated otherwise.
13. 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.

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 should be individually answered in full by BREC in one pleading and by Kenergy in a separate pleading.
3. These interrogatories are continuing in nature, and information of which the responding party later becomes aware, or gains access, and which is responsive to any request is to be made available to Kimberly-Clark Corporation and filed with the Commission. Any studies, documents, or other subject matter not yet completed that will be relied upon during this case should be so identified and provided as soon as they are completed. The Respondents are obliged to change, supplement, and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to each Respondent after the answers hereto are served.
4. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
5. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
6. Please answer each designated part of each information request separately. If either or both Respondents do not have complete information with respect to any interrogatory, so state and give as much information as the responding party has with respect to the matter inquired about, and identify each person whom the responding party believes may have additional information with respect thereto.
7. 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.
8. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

SUPPLEMENTAL REQUESTS FOR INFORMATION

- 2-1. Please provide directly to counsel for Kimberly-Clark any unredacted, confidential documents provided to other parties in this proceeding that are not publicly available.

- 2-2. See Kimberly-Clark's Request No. 1-6 and the e-mail exchange provided in response. Please provide a copy of the "N-1 evaluation" and the "summer and winter peak study results" referenced in that e-mail chain.
- 2-3. See Kimberly-Clark's Request No. 1-8 and your response thereto referring us to your response to Domtar 1-3. Please provide a copy of both studies referenced in your response to Domtar 1-3, including the study provided to Domtar under seal but not provided to Kimberly-Clark.
- 2-4. See Kimberly-Clark's Request No.1-15 and your response thereto referring to a confidential electronic file. Please provide this confidential electronic file with KC 1-15 in the file name or otherwise clarify where and when it has already been provided to Kimberly-Clark.
- 2-5. See Kimberly-Clark's Request No. 1-16 and your response thereto referring to a confidential electronic file. Please provide this confidential electronic file with KC 1-16 in the file name or otherwise clarify where and when it has already been provided to Kimberly-Clark.
- 2-6. See Kimberly-Clark's Request No. 1-22 and all subparts thereto. The referenced responses to the Commission's questions are not responsive to Kimberly Clark's inquiries. Please answer each of the subparts to Kimberly-Clark's question in 1-22 individually, avoiding broad references to other responses whenever possible and necessary to answer Kimberly-Clark's questions.
- 2-7. Please confirm that neither Big Rivers nor Kenergy has had any discussions with MISO since January 1, 2020, regarding any capacity accreditation for Kimberly Clark's behind-the-meter generation ("BTMG").
- 2-8. Please provide a copy of the contract between Big Rivers and the Southeastern Power Administration ("SEPA") that is referenced in BREC/Kenergy response to Kimberly-Clark Request No. 1-10.
- 2-9. Please provide a full response to Kimberly-Clark's Request No. 1-12 to show all capacity purchases made by Big Rivers since January 1, 2021, the source

of the capacity, the MW quantities that were purchased, and the price that Big Rivers paid.

- 2-10. Please provide a full response to Kimberly-Clark's Request No. 1-13 to show all capacity sales made by Big Rivers outside its system since January 1, 2021, the source of the capacity, the MW quantities of capacity that were sold with each transaction, and the prices paid to Big Rivers for each capacity transaction.
- 2-11. Please provide all testimony of Mr. John Wolfram that has been filed in Kentucky Public Service Commission proceedings over the past five years.
- 2-12. Please provide all testimony of Mr. John Wolfram, filed in Kentucky and/or in other states, regarding standby, maintenance, and/or back-up rates.
- 2-13. Please reconcile the fact that Big Rivers has MPRMs for Kimberly-Clark, but Big Rivers's responses to KC's Request Nos. 1-23.6 through 1-23.9 indicate that Big Rivers does not calculate MPRM on a customer level.
- 2-14. With respect to the Big Rivers response to Kimberly-Clark Request No. 1-27, please explain what, if any, incentives Big Rivers or Kenergy has to minimize the "actual costs associated with the Standby Customer's self-generation."
- 2-15. With respect to the Big Rivers response to Kimberly-Clark Request No. 1-27, please explain how Kimberly-Clark or other LICSS customers may minimize these costs.
- 2-16. Is Big Rivers intending to interface with MISO to ensure that eligible LICSS customers "meet and maintain eligibility as a MISO capacity resource"?
- 2-17. Has Big Rivers, under the current LICSS tariff provisions, undertaken any efforts for Kimberly-Clark's BTMG to "meet and maintain eligibility as a MISO capacity resource"?
- 2-18. Under the proposed LICSS Tariff, does Big Rivers intend for LICSS customers to interact directly with MISO in any way? If yes, please explain.

2-19. Has Big Rivers undertaken any efforts to register Kimberly-Clark's BTMG as an "LMR-BTMG"? If yes, please explain and provide all supporting documentation.

Respectfully Submitted,

/s/ Daniel E. Danford

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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Kentucky Public Service Commission on November 13, 2023; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and, by virtue of the Commission Order of July 22, 2021 in case number 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), no paper copies of this filing will be made.

/s/ Daniel E. Danford

Daniel E. Danford

Counsel for Kimberly-Clark Corporation