

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF BIG RIVERS)	
ELECTRIC CORPORATION AND KENERGY CORP.)	CASE NO.
TO IMPLEMENT A NEW STANDBY SERVICE)	2021-00289
TARIFF)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KIMBERLY-CLARK CORPORATION

Kimberly-Clark Corporation (Kimberly-Clark), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on November 12, 2021. The Commission directs Kimberly-Clark to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Kimberly-Clark shall make timely amendment to any prior response if Kimberly-Clark obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kimberly-Clark fails or refuses to furnish all or part of the requested information, Kimberly-Clark shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kimberly-Clark shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Justin Bieber Direct Testimony (Bieber Testimony), page 3, lines 66–67, and page 4, lines 68–69.

a. Explain why Big Rivers Electric Corporation (BREC) is only required to obtain a fraction of the self-supply capacity in order to supply maintenance and backup service.

b. Explain how much capacity BREC would be required to either maintain or acquire in order to provide the maintenance and backup service.

2. Refer to the Bieber Testimony, page 4, lines 70–75.

a. If BREC did not have any excess capacity, explain how much capacity BREC would have to procure to provide the service.

b. Explain whether Kimberly-Clark is completely energy self-sufficient and if not, explain how often it would utilize the Maintenance and Back-up service on a monthly basis. Include in the response whether Kimberly-Clark's reliance on the service is affected by weather or seasonal variations.

3. Refer to the Bieber Testimony, page 4, lines 76–80. PJM conducts an annual Base Residual Auction and several incremental auctions that set capacity market clearing prices. Given that BREC is a member of MISO, explain how BREC could obtain a competitive capacity price as the basis for pricing the capacity component of its tariff.

4. Refer to the Bieber Testimony, page 4, lines 84–87. Explain Kimberly-Clark's understanding of its self-generated capacity contribution to BREC's MISO required Planning Reserve Margin Requirement (PRMR).

5. Refer to the Bieber Testimony, page 5, lines 92–93. Explain the steps Kimberly-Clark takes currently to continue operations in the event that its generator goes offline and how the various procured services and commodities prices are set.

6. Refer to the Bieber Testimony, page 7, lines 136–146 and page 8, lines 147–148.

a. Explain the process between BREC and Kimberly-Clark to schedule maintenance outages.

b. Explain whether Kimberly-Clark provides a suggested wish list of outage periods and BREC selects the final maintenance outage periods.

c. Explain the duration and number of maintenance outages that are scheduled each calendar year.

d. Explain what an appropriate price would be in the event that BREC does have to procure capacity to provide the provision of maintenance power.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 28 2021
cc: Parties of Record

*J. Christopher Hopgood
Dorsey, Gray, Norment & Hopgood
318 Second Street
Henderson, KENTUCKY 42420

*Senthia Santana
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Tyson Kamuf
Corporate Attorney
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Kenergy Corp.
6402 Old Corydon Road
P. O. Box 18
Henderson, KY 42419

*Kenergy Corp.
Kenergy Corp.
6402 Old Corydon Road
P. O. Box 18
Henderson, KY 42419

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420