

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.

Big Rivers Electric Corporation (BREC) and Kenergy Corp. (Kenergy) (collectively, Joint Applicants), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than May 17, 2024. The Commission directs Joint Applicants 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 question to which the response is made and 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

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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Confirm whether actual LMP and real time LMP as referred to in Terry Wright's testimony on May 1, 2024, are the synonymous. If not, explain why not.

2. With consideration to the current Large Industrial Customer Standby Service (LICSS) pilot tariff, state whether there are any incentives currently in place for Kimberly-Clark Corporation (Kimberly-Clark) and Domtar Paper Company, LLC (Domtar) to provide advanced notice to BREC of planned maintenance outages. Also include in

the response if there's any incentive to provide advanced notice to BREC of planned maintenance outages with the proposed LICSS tariff.

3. Confirm that if capacity clears a gross cone in all four seasons of the MISO capacity market, it essentially wipes away the additional cost of applying the difference between the large industrial tariff and applying BREC's proposed LICSS tariff. If not, explain why not.

4. Taking the intervenors assertions and calculations at face value, that Mr. Baron's proposed tariff, as applied to Domtar, would result in an average \$2.5 million, or approximately 17 percent, increase in its rates, provide BREC and Kenergy's calculations, with cost justifications, for the following:

- a. The contribution to its margins;
- b. How it would be reflected through the member rate stability mechanism (MRSM); and
- c. The amount that would equate to a credit back to Domtar and Kimberly-Clark as positive contributions to margins, increase to the MRSM, and allocation amongst rural and industrial classes.



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

DATED MAY 03 2024

cc: Parties of Record

*Brigid L. Khuri
McNees Wallace & Nurick, LLC
777 North Capitol Street, NE, Suite
Washington, DISTRICT OF COLUMBIA 20002-

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

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

*Robert A. Weishaar, Jr.
McNees Wallace & Nurick, LLC
777 North Capitol Street, NE, Suite
Washington, DISTRICT OF COLUMBIA 20002-

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

*Tyson Kamuf
Corporate Attorney
Big Rivers Electric Corporation
710 West 2nd Street
P. O. Box 20015
Owensboro, KY 42304

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

*Big Rivers Electric Corporation
710 West 2nd Street
P. O. Box 20015
Owensboro, KY 42304

*David Giesel
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*Honorable Robert C Moore
Attorney At Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Daniel E Danford
Stites & Harbison
250 West Main Street, Suite 2300
Lexington, KENTUCKY 40507

*Susan E. Bruce
McNees Wallace & Nurick, LLC
777 North Capitol Street, NE, Suite
Washington, DISTRICT OF COLUMBIA 20002-

*M. Evan Buckley
Dinsmore & Shohl, LLP
City Center, 100 W. Main Street
Suite 900
Lexington, KENTUCKY 40507

*Senthia Santana
Big Rivers Electric Corporation
710 West 2nd Street
P. O. Box 20015
Owensboro, KY 42304

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

*Edward T Depp
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202