

February 25, 2026

VIA Electronic Tariff Filing System

Ms. Linda C. Bridwell
Executive Director
Public Service Commission
211 Sower Boulevard, P.O. Box 615
Frankfort, Kentucky 40601-0615

**RE: *JOINT LOAD MODIFYING RESOURCE AGREEMENT
BETWEEN BIG RIVERS ELECTRIC CORPORATION, KENERGY
CORP., AND PRATT PAPER (KY), LLC***

Dear Ms. Bridwell:

On behalf of Big Rivers Electric Corporation (“*Big Rivers*”) and Kenergy Corp. (“*Kenergy*”) (collectively “*the Applicants*”), Big Rivers submits for Commission review and approval a Load Modifying Resource (“*LMR*”) Agreement among Big Rivers, Kenergy, and Pratt Paper (KY), LLC (“*Pratt*”). The LMR Agreement supplements the Commission approved Retail Agreement for Electric Service under which Kenergy provides service to Pratt.¹ The LMR Agreement will allow Pratt to participate in MISO’s LMR program for the 2026–2027 Planning Year, provided MISO receives Pratt’s registration by March 1, 2026. To meet that MISO deadline, the Applicants request that the LMR Agreement be permitted to become effective on **February 27, 2026**, pending a final order.

Big Rivers has developed an internal process for administering MISO’s LMR program on behalf of its Member-Owners industrial members. The Applicants have coordinated with Pratt since late 2025 and Pratt confirmed this week that it wishes to proceed with a March 1 MISO registration. In addition to the potential financial benefits to Pratt, its LMR participation provides reliability benefits during severe events (MISO 2c and above) and creates an opportunity for system cost savings for Kenergy and Big Rivers. Big Rivers will receive 5% of the MISO LMR incentives to cover program administration. The LMR Agreement is a one-year participation

¹ *Electronic Tariff Filing of Big Rivers Electric Corporation and Kenergy Corp. for the Approval of a Special Contract with Economic Development Rates with Pratt Paper (KY) LLC, Case No. 2023-00045, Order (Feb. 10, 2023).*

agreement that essentially passes MISO's program requirements, risks, and benefits to Pratt. The LMR Agreement is in the process of being executed and the Applicants will supplement this filing with the signature page(s) as soon as possible.

Filing Basis

Under KRS 278.160, utilities must file schedules showing all rates and conditions of service, which includes special contracts such as the LMR Agreement. The filing is submitted electronically pursuant to 807 KAR 5:001 §13(3) and 807 KAR 5:011 §§2, 13–14, which also incorporate “statutory notice” requirements through KRS 278.180. Although KRS 278.180 generally requires 30 days’ notice (and no fewer than 20 days), KRS 278.190(2) authorizes the Commission to suspend a proposed tariff or special contract for any period up to the statutory maximum—including a single day—and then permit it to become effective pending final order (and, where appropriate, subject to refund) without disrupting the Commission’s substantive review.

Request

To ensure Pratt’s timely registration for the 2026–2027 Planning Year, the Applicants respectfully request that the Commission approve the LMR Agreement with an effective date of February 28, 2026, following a one-day suspension pursuant to KRS 278.190(2). Commission precedent supports this approach for time-sensitive tariff and contract filings.

The Commission routinely relies on KRS 278.190(2) to manage time-sensitive tariff and special-contract filings by briefly suspending (often one day) and then allowing the filing to take effect “pending the final Order” (and, as appropriate, subject to refund). Representative examples include:

1. *Electronic Tariff Filing of Kentucky Utilities Company for Approval of a License Agreement with North American Stainless Concerning Ghent Generating Station*, Case No. 2025-00016, Order (Jan. 23, 2025) (Commission allowed the license agreement related to a lay-down area to be placed in effect on or after the next day pending final order);
2. *Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC*, Case No. 2025-00204, Order (July 31, 2025) (one-day suspension; proposed rates permitted pending final order and subject to refund under KRS 278.190(2)); and

3. *Electronic Tariff Filing of Kentucky Power Company to Update its Purchase Power Adjustment and Decommissioning Rider Rates and its Securitized Surcharge Rider*, Case No. 2025-00307, Order (Sept. 26, 2025) (one-day suspension to Sept. 30, 2025; permitted to take effect subject to refund).

The Applicants appreciate the Commission's consideration on an expedited basis so that Pratt can be timely registered with MISO for the 2026–2027 Planning Year.

Should you have any questions about this tariff filing or the other documents referenced herein, you may contact me at 270-844-6185 or at tyson.kamuf@bigrivers.com.

Sincerely yours,
/s/ Tyson Kamuf
Tyson Kamuf
Big Rivers Electric Corporation
General Counsel

cc: Kenergy Corp.
Pratt Paper (KY), LLC