



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

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

**Big Rivers Electric Corporation
and Kenergy Corp.**

**Joint Responses to Commission Staff's
First Request for Information
dated**

August 18, 2021

FILED: September 3, 2021

BIG RIVERS ELECTRIC CORPORATION

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

VERIFICATION

I, Paul G. Smith, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Paul Smith

Paul G. Smith

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

1st SUBSCRIBED AND SWORN TO before me by Paul G. Smith on this the
day of September, 2021.

Joy P. Parsley

Notary Public, Kentucky State at Large

My Commission Expires _____


Notary Public, Kentucky State-At-Large
My Commission Expires: July 10, 2022
ID: 604480

BIG RIVERS ELECTRIC CORPORATION

**ELECTRONIC TARIFF FILING OF
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VERIFICATION

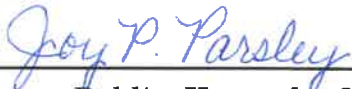
I, Mark J. Eacret, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Mark J. Eacret

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

1st SUBSCRIBED AND SWORN TO before me by Mark J. Eacret on this the
_____ day of September, 2021.



Notary Public, Kentucky State at Large
My Commission Expires _____

Notary Public, Kentucky State-At-Large
My Commission Expires: July 10, 2022
ID: 604480

**BIG RIVERS ELECTRIC CORPORATION
KENERGY CORP.**

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1 **Item 1)** *Refer to the Application, proposed tariff LICSS – Large*
2 *Industrial Customer Standby Service (LICSS), Sheet No. 69. Explain whether*
3 *this tariff applies to counterparties of BREC's three solar power purchase*
4 *agreements.*

5

6 **Response)** Big Rivers provides service to its three Members through two customer
7 classes: the Large Industrial Customer (“LIC”) class and the Rural Delivery Service
8 (“RDS”) class. Approximately 20 of the largest industrial customers served by the
9 Members fall under the LIC class. All other retail customers fall under the RDS class.

10 The proposed LICSS tariff only applies to retail customers of Big Rivers’
11 Members whose service falls under the LIC class. The counterparties to the three
12 solar power purchase agreements will be in the RDS class, and so, the LICSS tariff
13 will not apply to them.

14

15

16 **Witness)** Mark J. Eacret

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1 **Item 2) Refer to the Application, proposed tariff LICSS, Sheet Nos. 69–**
2 **69.01 and to the Direct Testimony of Mark J. Eacret, page 17, lines 1–13, in**
3 **Case No. 2021-00282.¹ Provide in Excel format with all formulas, columns,**
4 **and rows unprotected and fully accessible BREC's monthly estimate of the**
5 **energy and capacity requirements it would have to supply for those large**
6 **industrial customers who are or potentially may be standby customers and**
7 **who may subscribe to one or all of the services to be offered through LICSS**
8 **for the period 2022–2026. Include with the response BREC's Midcontinent**
9 **Independent System Operator (MISO) capacity requirements and BREC's**
10 **capacity position and reserve margin including transmission losses and the**
11 **PPAs when they come online.**

12

13

¹ Case No. 2021-00282, *Electronic Tariff Filing of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation for Approval and Confidential Treatment of a Special Contract and Cost Analysis Information and a Request for Deviation from the Commission's September 24, 1990 in Administrative Case No. 327* (filed June 21, 2021).

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1 **Response)** Paper Excellence (formerly Domtar) and Kimberly Clark Corporation
2 are the only two large industrial members of which Big Rivers is aware who
3 potentially may subscribe to one or all of the services to be offered through the
4 proposed LICSS tariff for the period 2022–2026.

5 Big Rivers will not be providing any additional MISO capacity to these two
6 retail members because they subscribe to services offered through LICSS. The MISO-
7 accredited capacity value of the members' generation equipment will reduce the
8 amount of MISO-accredited capacity which Big Rivers would otherwise need to
9 provide. The value associated with that generation is the rationale for the \$3.80/kw-
10 month credit applied to Maintenance Power/Backup Power.

11 Please see the confidential Excel spreadsheet provided with these responses
12 for the data requested.

13

14

15 **Witness)** Mark J. Eacret

16

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1 **Item 3)** *Refer to the Application, proposed Tariff LICSS, Sheet No. 69.03–*
2 *69.04. Provide a numerical billing example of an industrial customer for*
3 *which maintenance and back-up service is provided during a month.*

4

5 **Response)** Please see the requested numerical billing example attached to this
6 response.

7

8

9 **Witness)** Paul G. Smith

10

EXAMPLE INVOICE

KENERGY CORP P.O.BOX 18 HENDERSON, KY 42419-0018
 MONTH ENDING 7/31/21

TO LARGE INDUSTRIAL CUSTOMER ACCOUNT 0.0
 Attn: Accounts Payable
 Owensboro, KY 42301

SUBSTATION LARGE INDUSTRIAL CUSTOMER SERVICE FROM 7/01/21 THRU 7/31/21

USAGE	DEMAND	TIME	DAY	METER	MULT	KW DEMAND
		4:00A	7/11	33.94800	1000	19,948
POWER FACTOR	BASE	PEAK	AVERAGE	BILLED	SELF-SUPPLY	
	90.00%	96.00%		PEAK	12,672	

SUPPLEMENTAL POWER

CUSTOMER CHARGE 1,028.00
 ACTUAL DEMAND 19,948 KW TIMES \$10.7150000 EQUALS\$ 213,742.82

SUB-TOTAL \$ 214,770.82

ENERGY 11,750,088 KWH AT \$.0380500 EQUALS\$ 447,090.85

SUPPLEMENTAL DEMAND AND ENERGY \$ 661,861.67

MAINTENANCE & BACKUP POWER

DEMAND	14,000 KW TIMES	\$6.915	EQUALS\$	96,810.00
ENERGY	1,256,420 KWH		EQUALS\$	47,806.78

ADMINISTRATIVE CHARGE 150.00

MAINT AND BACKUP SUBTOTAL \$ 144,766.78

TOTAL DEMAND AND ENERGY \$ 806,628.45

FUEL ADJUSTMENT CLAUSE 13,006,508 KWH AT \$.0004190- EQUALS\$ 5,449.73-

NON-SMELTER NON-FAC PPA 13,006,508 KWH AT \$.0016780 EQUALS\$ 21,824.92

ENVIRONMENTAL SURCHARGE \$821,975.64 TAR AT 8.8842800 % EQUALS\$ 73,026.62

MRSM ADJUSTMENT LARGE INDUSTRIAL 50,187.94-

RETAIL ADDER 22,166,088 KWH AT \$.000166 EQUALS\$ 3,679.57

TOTAL AMOUNT DUE \$ 849,521.89

KW DEMAND FOR PAST 12 MONTHS

8/20	35,726	9/20	35,165	10/20	36,331	11/20	35,640
12/20	34,646	1/21	34,949	2/21	34,301	3/21	33,610
4/21	33,696	5/21	33,739	6/21	34,214	7/21	33,948

---LOAD FACTOR---
 ACTUAL BILLED
 60.22% 60.22%

MILLS PER KWH
 65.23

DUE IN
 IMMEDIATELY AVAILABLE FUNDS
 ON THIS DATE
 8/25/21

NOTE: If paying by check, it must be mailed in sufficient time (at least 7 days prior to date above) for funds to become collected on the date above. Interest charges will be assessed based on the date the funds become collected to Kenergy Corporation.

REMIT PAYMENT TO: Kenergy Corporation
 P.O. Box 1389
 Owensboro, KY 42302-1389

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1 **Item 4)** *Refer to the Application, Direct Testimony of John Wolfram, page*
2 *4, lines 11–13. Confirm that the provision requiring the standby customer to*
3 *pay the higher of the standard LIC tariff energy charge or market for all*
4 *Maintenance Power and Backup Supply Power energy usage is only in the*
5 *Maintenance Power Service and Backup Power Service section of Tariff*
6 *LICSS.*

7

8 **Response)** Confirmed.

9

10

11 **Witness)** Mark J. Eacret

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