

1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION
3

4 In the Matter of:
5

ELECTRONIC INVESTIGATION OF THE)	
AMENDMENTS TO THE PUBLIC UTILITY)	Case No.
REGULATORY POLICIES ACT OF 1978)	2022-00370
AND DEMAND SIDE PRACTICES)	

6

7 JOINT COMMENTS AND RESPONSES OF BIG RIVERS ELECTRIC
8 CORPORATION, JACKSON PURCHASE ENERGY CORPORATION,
9 KENERGY CORP., AND MEADE COUNTY RURAL ELECTRIC
10 COOPERATIVE CORPORATION
11

12 Big Rivers Electric Corporation (“*Big Rivers*”), by counsel, and on behalf of
13 itself and its three member distribution cooperatives, Jackson Purchase Energy
14 Corporation (“*Jackson Purchase*”), Kenergy Corp. (“*Kenergy*”), and Meade County
15 Rural Electric Cooperative Corporation (“*Meade County RECC*”) (collectively, the
16 “*Members*”) respectfully submits these comments in response to the Public Service
17 Commission’s (the “*Commission*”) Order dated November 7, 2022 (“*November 7th*
18 *Order*”), which directed each jurisdictional electric utility to file responsive written
19 comments.¹

20 I. INTRODUCTION

21 In the November 7th Order, the Commission required all Kentucky
22 jurisdictional electric utilities to file written comments providing the following:

¹ November 7th Order, at p. 3.

- 1 1. A report of existing measures used to promote the use of demand-response
2 and demand flexibility practices by commercial, residential, and industrial
3 consumers to reduce electricity consumption during periods of unusually
4 high demand.
- 5 2. Appropriate measure to promote greater the use of demand-response and
6 demand flexibility practices by commercial, residential, and industrial
7 consumers to reduce electricity consumption during periods of unusually
8 high demand.²

9 **II. EXISTING MEASURES TO PROMOTE DEMAND-RESPONSE AND**
10 **DEMAND FLEXIBILITY PRACTICES**

11 Each of Big Rivers’ three Members budgets, plans, administers, and
12 implements demand response programs independently, and Big Rivers assists its
13 Members in evaluating the potential impacts of new energy efficiency and demand
14 response programs. Big Rivers and its Members work together to maintain
15 residential and non-residential energy efficiency education and provide onsite
16 efficiency evaluations for commercial and industrial members upon request. We
17 continue to monitor and evaluate potential load management and other demand
18 response programs, looking for reductions in costs or increases in peak demand
19 reduction benefits that could be available at a lower cost than programs evaluated
20 in the 2020 Demand-Side Management Potential Study (the “*2020 DSM Study*”)
21 filed with Big Rivers’ 2020 Integrated Resource Plan (“*2020 IRP*”).³

22 Big Rivers and its Members offer a Voluntary Curtailment Rider, which
23 provides a means for potentially reducing system peak demand during peak periods.

² November 7th Order at p. 2.

³ *In the Matter of: Electronic 2020 Integrated Resource Plan of Big Rivers Electric Corporation*, P.S.C. Case No. 2020-0029, Big Rivers’ 2020 IRP at Appendix B (Sept. 21, 2020).

1 In the last sixteen years, there have been four curtailments affecting two
2 commercial customers. The maximum estimated load reduction due to the
3 voluntary curtailment customers is 20 – 25 MWs. There have been no curtailments
4 since 2010.

5 Additionally, through the Low-Income Weatherization Support Program
6 (“*LIWSP*”),⁴ Big Rivers and its Members provide funding to local Community Action
7 Agencies (“*CAAs*”) that provide weatherization assistance to low-income residential
8 customers of Big Rivers’ Members pursuant to the Federal Department of Energy’s
9 Weatherization Assistance Program.

10 **III. FURTHER PROMOTION OF DEMAND RESPONSE AND**
11 **DEMAND FLEXIBILITY**

12 Big Rivers’ 2020 IRP provided a full discussion of the 2020 DSM Study, which is
13 the most recent demand response analysis performed on behalf of Big Rivers. At
14 that time, market prices for capacity in the Midcontinent Independent System
15 Operator (“*MISO*”) markets had been low for the preceding decade. Therefore, the
16 benefits of demand response programs were low, even lower than in Big Rivers’
17 2017 DSM Potential Study. In fact, most of the demand response programs
18 analyzed in the 2020 DSM Study did not pass the Total Resource Cost (“*TRC*”) test.

19 The market price for capacity in MISO has risen and large industrial
20 customers have recently been more open to demand response discussions. Big

⁴ See *In the Matter of: Electronic Demand-Side Management Filing of Big Rivers Electric Corporation to Implement a Low-Income Weatherization Support Program*, P.S.C. Case No. 2019-00193, Order (Nov. 13, 2019).

1 Rivers is currently in the initial stage of developing its 2023 Integrated Resource
2 Plan, and will be working with its Members to evaluate cost-effective demand
3 response opportunities. An updated DSM Study will include a full evaluation of
4 possible demand response programs available in Big Rivers' service territory to
5 further encourage demand response.

6 **IV. CONCLUSION**

7 Big Rivers' mission is to safely deliver competitive and reliable wholesale
8 power and cost-effective shared services desired by its Members. The Members in
9 turn provide safe, reliable, and affordable power to their member-owners. In line
10 with their missions. Big Rivers and its Members will continue to implement
11 appropriate measures to promote demand-response and demand flexibility practices
12 by their commercial, residential, and industrial customers.

1 Filed this 16th day of December, 2022.
2

3 Respectfully submitted,
4

5 BIG RIVERS ELECTRIC CORPORATION
6

7 /s/ Tyson Kamuf
8

9 Tyson Kamuf
10 Senthia Santana
11 Whitney Kegley
12 201 Third Street, P.O. Box 24
13 Henderson, Kentucky 42419-0024
14 Phone: (270) 827-2561
15 Fax: (270)844-6417
16 Email: tyson.kamuf@bigrivers.com
17 Email: senthia.santana@bigrivers.com
18 Email: whitney.kegley@bigrivers.com
19

20 *Counsel for Big Rivers Electric Corporation*
21
22

23

24