

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.’S
FIRST REQUESTS FOR INFORMATION TO
DOMTAR PAPER COMPANY, LLC

In accordance with the Scheduling Order by the Kentucky Public Service Commission (“Commission”), Big Rivers Electric Corporation (“Big Rivers”) and Kenergy Corp. (“Kenergy”), by counsel, hereby request the response of Domtar Paper Company, LLC, to the following Requests for Information.

DEFINITIONS

1. Whenever it is necessary to bring within the scope of these information requests documents that might otherwise be construed to be outside their scope: (1) the use of “and” as well as “or” shall be construed both disjunctively and conjunctively; (2) the use of a word in its singular form shall be construed to include within its meaning its plural form as well, and vice versa; (3) the use of “include” and “including” shall be construed to mean “without limitation”; and (4) the use of a verb in any tense or voice shall be construed as the use of that verb in all other tenses and voices.

2. “**Commission**” means the Kentucky Public Service Commission.

3. “**Document**” means any written, recorded, transcribed, printed, or impressed matter of whatever kind, however produced, stored or reproduced, including but not limited to

sound or pictorial recordings, computerized or electronic information, books, pamphlets, letters, memoranda, telegrams, electronic or mechanical transmissions, communications of all kinds, reports, notes, working papers, handwritings, charts, paper, writings, printings, transcriptions, tapes and records of all kinds. "Document" includes, without limitation, all workpapers produced by or relied upon by a witness.

4. **"Identify"** mean the following:

a: when identifying a person, to give such person's:

- (1) full name;
- (2) business address, residence address (if no business address is available), and telephone number;
- (3) his or her present or last known position and business affiliation at the time in question; and
- (4) the nature of such person's participation in, and the scope of his/her responsibility with regard to, the facts and events underlying the present matter;

b: when identify an oral communication, to:

- (1) identify the author(s) thereof and the parties thereto;
- (2) state the date of the communication;
- (3) state the place of the communication;
- (4) state the substance of the communication; and
- (5) state whether such communication has been reduced to writing and, if so, identify each document and the present custodian thereof;

c: when identifying other information, to state:

- (1) the source thereof;
- (2) any oral communications pertaining thereto;

- (3) any documents pertaining thereto; and
- (4) the substance of the information;

d: when identifying a document, to:

- (1) identify the author thereof and the parties thereto;
- (2) state its title or other identifying data;
- (3) state the date of the document or, if no date appears thereon, the approximate date;
- (4) state the exact nature and substance thereof;
- (5) identify each person having possession, care, custody, or control of the original and any copies thereof; and
- (6) if such document was, but no longer is, in your possession or subject to your control, state what disposition was made of it.

5. “**Person**” includes a natural person, a business organization of any type, an unincorporated association, a governmental subdivision, agency, or entity, and a business trust.

6. “**Big Rivers**” and “**Kenergy**” shall mean Big Rivers Electric Corporation and Kenergy Corp. as defined and identified in the first paragraph of this Request for Information.

8. “**You**” or “**Your**” means Domtar Paper Company, LLC, an intervenor in this action, and its agents, officers, employees, commissioners, consultants, and witnesses.

GENERAL INSTRUCTIONS

1. Please identify the witness who will be prepared to answer questions concerning each request.

2. If any request appears confusing, please request clarification directly from the undersigned.

3. To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper or information.

4. If you object to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.

5. For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature of and legal basis for the privilege asserted.

6. To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

7. These requests shall be deemed continuing, and you should serve upon counsel: (1) supplemental responses to these data requests if additional information or information that changes your response to any data request is obtained during the course of this proceeding; and (2) any documents requested herein that become available or that are discovered after the date your responses to these requests are due.

REQUEST FOR INFORMATION

1. Refer to the testimony of Mr. Stephen Baron, page 3, lines 9-13. Please provide the referenced *Public Utilities Fortnightly* article.
2. Refer to the testimony of Mr. Stephen Baron, page 3, lines 9-13. Please provide the testimony and any other documents sponsored by Mr. Baron in the referenced Arkansas Power and Light Company proceeding in Docket No. 87-183-TF.
3. Refer to the testimony of Mr. Stephen Baron, page 3, lines 9-13. Other than the cited case, does Mr. Baron have any other specific experience in the development of a standby and maintenance power rate? If so, please describe that experience

and include case or docket numbers of regulatory proceedings that Mr. Baron has testified in on the subject of standby and maintenance power rates.

4. Refer to the testimony of Mr. Stephen Baron, page 7, lines 7-18. Are you aware of any differences in planning or cost that may accompany the provision of service to a 30 MW load versus a 1.5 MW load? Please explain in detail why you believe that any such difference(s) may or may not exist.
5. Refer to the testimony of Mr. Stephen Baron, page 10, lines 7-8. Please describe in detail and provide copies of all support relied upon for the conclusion that “[i]f Domtar’s 52 MW QF did not exist, then the planned in-service date of Big Rivers’ 635 MW NGCC would be moved up.”
6. Refer to the testimony of Mr. Stephen Baron, page 12, lines 1-12. Please explain what additional demand-related costs a utility should recover from a customer seeking maintenance power that are not already recovered from that customer in connection with the utility’s provision of backup power. If none, explain the need for separate rates.
7. Refer to the testimony of Mr. Stephen Baron, page 12, lines 13-21. How does Domtar propose that Big Rivers and/or Kenergy determine a customer’s generation reliability factor? If Big Rivers and/or Kenergy relies on this factor and utilizes the factor in its capacity planning, but the customer’s generation is ultimately less reliable than anticipated (e.g., due to poor maintenance practices, unrelated operational issues, etc.), does Big Rivers and/or Kenergy bear the cost-related and reliability-related risks attendant to the unplanned need for energy?
8. Refer to the testimony of Mr. Stephen Baron, Table 2 and accompanying text, Exhibits SJB-11, SJB-12. Please provide all documents and information upon which you relied in connection with this analysis, including all workpapers in functioning electronic format with formulas intact.
9. Identify in detail all efforts, historical and current, with respect to the accreditation of Domtar’s generator as a behind-the-meter generator with MISO. Please provide all related communications and documents. Please identify all amounts earned as Capacity Payments as a consequence of any accreditation, current status, and the reasons underpinning any historical changes in status.
10. Refer to the testimony of Mr. Stephen Thomas, page 2, lines 17-20. Please identify and describe each of Domtar’s mills and converting facilities in the US and Canada, including its location, source of energy supply, agreement or tariff pursuant to which it obtains energy, relevant RTO or balancing authority, on-site generation, detailed electricity cost information by month for past five (5) years

11. Refer to the testimony of Mr. Stephen Thomas, page 4, lines 21-22. Please describe and quantify the “historical price advantage on energy” that Domtar’s Hawesville facility has experienced.
12. Refer to the testimony of Mr. Stephen Thomas, page 7, lines 2-5. Please provide all documents and information upon which you relied in connection with this analysis, including all workpapers in functioning electronic format with formulas intact.
13. Refer to the testimony of Mr. Stephen Thomas, page 7, line 22. Please describe in detail Mr. Thomas’s “regulatory background,” and identify all regulatory matters in which Mr. Thomas has served as a witness. Provide a copy of any testimony, as well as a CV reflecting any publications, etc.
14. Refer to the testimony of Mr. Stephen Thomas, page 10, lines 9-21. Regarding the “alternative proposal,” please explain whether and how it ensures Big Rivers’ recovery of costs necessarily incurred to provide the standby service, including (but not limited to) the costs to build and maintain the infrastructure required to serve all load. Please identify and describe in detail Domtar’s “revenue obligations to the shared system.”
15. Refer to the testimony of Mr. Stephen Thomas, Exhibit 2. Please provide all documents and information upon which you relied in connection with this analysis, including all workpapers in functioning electronic format with formulas intact.
16. Please provide a copy of any agreement between Domtar and Mr. Baron.
17. Please identify any RTOs from which Domtar or any of its operating affiliates has sought accreditation for behind the meter generation. For each such instance, please provide the following information:
 - i. identify the name of the RTO;
 - ii. describe in detail the process followed in order to obtain accreditation;
 - iii. identify the amounts and nature of all costs incurred in connection therewith;
 - iv. identify the nameplate capacity for the behind the meter generation accredited;
 - v. identify the capacity for which the RTO accredited you and the date(s) of accreditation; and

- vi. if accreditation was denied (in whole or in part), provide a detailed explanation of why accreditation was denied and all documentation provided by the RTO regarding such denial.

On this the 18th day of December, 2023.

Respectfully submitted,

/s/ Edward T. Depp
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Certification

I hereby certify that a copy of this filing has been served electronically on all parties of record through the use of the Commission's electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp _____
Counsel to Big Rivers Electric Corporation