

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

Electronic Tariff Filing of Big Rivers Electric  
Corporation and Kenergy Corp. to Revise the Large  
Industrial Customer Standby Service Tariff.

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Case No. 2023-00312

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**FIRST SET OF DISCOVERY OF DOMTAR PAPER COMPANY, LLC  
TO BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.**

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**COUNSEL DOMTAR PAPER COMPANY,  
LLC**

Dated:           October 13, 2023

## DEFINITIONS

1. “Document(s)” is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, memoranda, reports, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.
2. “Correspondence” is used in its customary broad sense and includes electronic email, including all attachments, and all written mail, messages and communications between the persons or parties named in the request.
3. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final, and whether or not referred to in Big Rivers’ direct testimony.
4. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.
5. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
6. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
7. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
8. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
9. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
10. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
11. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
12. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
13. “BREC” or “Big Rivers” means Big Rivers Electric Corporation and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.
14. “Kenergy” or means Kenergy Corp. and/or any of its officers, directors, employees, or agents who may have knowledge of the particular matter addressed.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Domtar Paper Company, LLC. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

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- Q.1-1. Please provide a copy of all discovery responses provided to the Staff and other parties.
- Q.1-2. Refer to Big Rivers' Rate Schedule LIC.
  - a. Please provide the class cost of service study in Excel, with formulas, developed by BREC in Case 2013-00199 that supports the current LIC demand and energy charge.
  - b. Please identify the base amount of fuel costs included in the LIC energy charge.
  - c. To the extent not provided in Part(a) above, please provide any functional cost study and unit cost of service study developed as part of the class cost of service study.
  - d. To the extent that BREC developed a compliance class cost of service study reflecting the Commission's Order in Case 2013-00199, please provide the information requested in Parts(a) and (c) above consistent with the compliance class cost of service study.
- Q.1-3. Please provide the most recent class cost of service study prepared by BREC. To the extent that such a study has been developed, please provide the study consistent with the information requested in the prior question, Parts (a) and (c).
- Q.1-4. Refer to BREC's proposed Large Industrial Customer Standby Service (LICSS) tariff filed September 1, 2023.
  - a. Identify each of the individuals, including their titles, at BREC who developed Rate LICSS.
  - b. Did BREC rely on any consultants or other outside individuals in its development of Rate LICSS. If so, provide the following:
    - i. The name of the individual, the individual's Company and the individual's resume, including testimony experience.
    - ii. Provide a copy of the retention agreement.
    - iii. Provide copies of all reports, analyses, memoranda or other writings provided by the outside individual to BREC.

- c. Provide copies of all internal memoranda, reports, analyses or other writings addressing Rate LICSS.
- Q.1-5. Please identify any utilities that BREC is aware of that has a standby and maintenance power tariff similar to BREC's proposed Rate LICSS. Include the name of the utility, the title of the rate or tariff and, if available to BREC, a copy of the rate or tariff.
- Q.1-6. In its development of Rate LICSS, did BREC review standby and maintenance power rates of other utilities? If so, identify each such utility and the name or title of the tariff.
- Q.1-7. As part of its development of Rate LICSS, did BREC develop any other alternative standby and maintenance power rate schedules? If so, please provide copies of all such schedules. If BREC no longer has these alternative rate schedules, please provide a narrative explaining how each such alternative rate schedule differed from the final version of Rate LICSS.
- Q.1-8. Refer to Rate LICSS. Is it BREC's position that a standby load should pay for transmission service based on 100% of the cost of transmission service based on the maximum contract standby load? In other words, does Rate LICSS charge a standby customer for the cost of transmission service irrespective of the customer's self-supply capacity?
- Q.1-9. Please provide a narrative explaining how BREC is charged for transmission service under the MISO OATT. Include the current charge for Network Integrated Transmission Service ("NITS") that BREC pays under the MISO OATT. Also include the basis for the determination of BREC's billing determinants used to calculate BREC's charges for NITS under the OATT.
- Q.1-10. Please provide the MISO Planning Resource Auction ("PRA") Auction Clearing Price applicable to BREC for the current year and each of the prior 5 years.
- Q.1-11. For the past 12 months (or the most recent 12-month period for which data is available), please provide the following information regarding Rate Schedule LIC:
- a. Total number of customers on the rate schedule.
  - b. Total revenues for the rate schedule, broken down by:
    - i. Base revenues
    - ii. Revenues produced by each adjustment clause rider or surcharge applicable to Rate LIC, separately stated for each such adjustment clause, rider or surcharge.
  - c. Billing determinates (kW, kWh) by month.
- Q.1-12. Refer to the Rate LIC kW demand charge. Please provide a breakdown of the generation and transmission components of the current LIC kW charge of \$10.1750/kW (i.e., how much of the \$10.175 charge is associated with generation/production demand and how much is associated with transmission demand). To the extent that the \$10.175/kW charge includes a cost component for something other than generation/production and transmission, please identify such component(s) and state the amount of the \$10.175/kW charge associated with such component/cost.

- Q.1-13. Refer to the Rate LIC energy charge of \$0.03805/kWh. Please state whether this energy charge includes the recovery of fixed generation/production and/or fixed transmission costs. If so, please identify the amount (in \$/kWh) of fixed generation/production, fixed transmission costs that are being recovered in this energy charge.
- Q.1-14. Refer to proposed Rate LICSS.
- a. With regard to Sheet No. 69.04 “2. Energy Charges,” please provide a list of the “plus any transmission charges, MISO fees, or other costs” that are referred to in this section. For each such charge, fee or other cost, please list and describe the charge, fee or other cost and provide the current amount of the charge.
  - b. With regard to Sheet No. 69.04 “2. Energy Charges,” please explain why BREC believes that it is appropriate and consistent with cost-based rate making to charge for Backup Power energy usage at the higher of the energy charge associated with Rate LIC or LMP. Also, please state whether the LMP used is Day-Ahead or Real-Time and identify the node at which its based.
- Q.1-15. Refer to proposed Rate LICSS. With regard to Sheet No. 69.04, paragraph No. 5, please provide a list of the “MISO charges, fees, penalties, or other cost associated with Standby Customer’s generation, outages of Standby Customer’s generation or Backup Power service.” For each such charge, fee or other cost, please list and describe the charge, fee or other cost and provide the current amount of the charge.
- Q.1-16. Assuming that the Company’s proposed Rate LICSS is approved, please provide BREC’s projection of the annual cost to Domtar for a) Backup Power Service; b) Maintenance Power Service and c) the total annual cost to Domtar including Backup Power Service, Maintenance Power Service and standard service under Rate LIC. Please provide all supporting workpapers, in Excel, including assumed market prices, billing determinants, etc. Such information should be treated as confidential as it is proprietary to Domtar.

Respectfully submitted,

/s/ Michael L. Kurtz

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**COUNSEL FOR DOMTAR PAPER  
COMPANY, LLC**

October 13, 2023