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

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| IN THE MATTER OF: | : | |
| Electronic Tariff Filing of Big Rivers Electric | : | |
| Corporation and Kenergy Corp. to Revise the Large | : | Case No. 2023-00312 |
| Industrial Customer Standby Service Tariff. | : | |

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**JOINT REQUESTS FOR INFORMATION ON REBUTTAL OF DOMTAR PAPER COMPANY, LLC AND KIMBERLY-CLARK CORPORATION TO BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.**

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3-1. Reference Rebuttal Testimony of Terry Wright, Jr. ("Wright Rebuttal") at 4, lines 14-16. Please confirm or deny, that under Big Rivers' proposed LICSS design, assuming Midcontinent Independent System Operator ("MISO") accreditation of the customer's generator, such accredited capacity will be counted in meeting Big Rivers' resource adequacy requirement with MISO. If denied, please fully explain. If confirmed, please provide Mr. Wright's understanding of how MISO will determine the capacity value of the customer's generation.

3-2. Reference Wright Rebuttal at 4, lines 11-13. Please explain whether the question is referring to how Big Rivers treats Domtar's and Kimberly-Clark's generators for Big Rivers planning purposes or how MISO treats Domtar's and Kimberly-Clark's generators.

3-3. Reference Wright Rebuttal at 4, line 14 through 5, line 2:

a. Please provide an explanation of how Big Rivers includes the Mega Watts associated with Domtar's and Kimberly Clark's generators in submissions to MISO, including but not limited to its peak load forecasts. To the extent that this has changed during the past five (5) MISO planning years, please describe and provide the justification for each such change. Under the new LICSS, will this approach change?

b. Does MISO dictate how Big Rivers determines its load requirements? If so, please provide an explanation of how, including citation to the applicable MISO tariff and business manual references.

c. How has Big Rivers accounted for Domtar's and Kimberly-Clark's load and generators since Big Rivers has joined MISO (e.g., behind the meter generator, net load, gross load less generation, etc.)?

d. Since joining MISO, has Big Rivers ever requested that MISO designate Domtar's or Kimberly-Clark's generators as a load modifying resource-behind the meter generator? If so, please provide each such Big Rivers request/filing/submission and MISO's response.

e. Would approval of the proposed LICSS require Domtar and Kimberly-Clark to become designated as load modifying resource-behind the meter generators? Would this status require Domtar and Kimberly-Clark to become MISO members?

f. To Big Rivers' knowledge, has MISO ever accredited Domtar's or Kimberly- Clark's generators? If so, please provide the most recent MISO MW capacity Seasonal Accredited Capacity ("SAC").

g. To the extent that a forced outage to either the Domtar or Kimberly-Clark accredited generator does occur, please explain the impact on Big Rivers, specifically from MISO, if Big Rivers' actual load during a delivery year is "higher than the load submitted as part of its MISO Non-Coincident and Coincident Peak submission." Include each charge or potential penalty that would be imposed by MISO on Big Rivers in this event.

h. If one of Big Rivers' generation resources that has been accepted as part of the delivery year PRA is forced out at the time of MISO's system peak or another Resource Agency ("RA") hour, please provide each and every charge, penalty, etc. that would be imposed by MISO on Big Rivers and explain how such an event would differ from an event wherein Domtar's or Kimberly-Clark's generators were forced out.

3-4. Reference Wright Rebuttal at 5, lines 5-8.

a. Please explain any difference to Big Rivers, from a planning perspective, between either Domtar's or Kimberly-Clark's generator and any of Big Rivers' owned capacity resources, assuming that they had the same forced outage rate.

b. Are all of Big Rivers' owned capacity resources guaranteed to be available at the time of a system peak or RA hour? How does Big Rivers reflect forced outages of its generating resources in its resource planning?

c. What factual data does Big Rivers have to support the contention that forced outages by all facilities on the utility system will occur simultaneously?

d. For each of the Big Rivers generating units accepted by MISO in the 2023-2024 delivery year PRA, please provide its effective forced outage rate during each of the RA hours.

e. Provide the effective forced outage rates of Domtar's and Kimberly Clark's generators during each of the RA hours.

f. List and describe each of the ways in which Big Rivers incorporates probabilities in its forecasting.

3-5. Reference Wright Rebuttal testimony at 5, line 20 through 6, line 2. Please provide the support for Mr. Wright's statement that "the risk of shortfall is assured."

3-6. Reference Wright Rebuttal at 6, lines 5-7.

a. Is it Mr. Wright's testimony that MISO does not use probability of a forced outage in determining the Seasonal Accredited Capacity (SAC)? Please explain your answer.

b. Please provide any references to "the possibility of forced outage" in determining the capacity by MISO or any other RTO or authority.

3-7. Reference Wright Rebuttal at 6, lines 17-18.

a. Please provide a copy of the source data supporting the statement "there were 4,175.2 MWs of behind-the-meter generation registered for Summer 23-24."

b. Do any other utilities in Kentucky or MISO require their customers owning behind the meter generation to register as Load Modifying Resource – Behind the Meter Generation with MISO?

3-8. Reference Wright Rebuttal at 6, lines 19-20. Please confirm or deny that the method used by MISO to assign "a SAC value" utilizes a seasonal forced outage rate.

3-9. Please provide Mr. Wright's understanding of the options for Qualifying Facilities (QF) for MISO PRA market participation and how those options potentially differ from non-QF behind-the-meter generation.

3-10. Reference Wright Rebuttal at 7 of 11, lines 17-20. Does Mr. Wright disagree with the following provisions from 18 CFR Ch. I § 292.305(c)? Please explain.

(c) ***Rates for sales of back-up and maintenance power.*** The rate for sales of backup power or maintenance power:

(1) Shall not be based upon an assumption (unless supported by factual data) that forced outages or other reductions in electric output by all qualifying facilities on an electric utility's system will occur simultaneously, or during the system peak, or both; and

(2) Shall take into account the extent to which scheduled outages of the qualifying facilities can be usefully coordinated with scheduled outages of the utility's facilities.

3-11. Reference Wright Rebuttal testimony at 7, line 20 through 8, line 2. To the extent that a forced outage does occur to the Domtar or Kimberly-Clark accredited generator, please explain the impact on Big Rivers, specifically from MISO, if Big Rivers' actual load during a delivery year is "higher than the load submitted as part of its MISO Non-Coincident and Coincident Peak submission." Include each charge or potential penalty that would be imposed by MISO on Big Rivers in this event.

3-12. Reference Wright Rebuttal at 8, line 3 through 10, line 6.

a. Does Big Rivers seek prior approval from MISO of Big Rivers' schedule for maintenance of its generating units?

b. For the 2023-2024 Delivery Year, please provide Big Rivers' MISO approved schedule for maintenance, by generating unit.

c. As a result of MISO's Seasonal PRA, is Big Rivers able to schedule maintenance for its generating units? If so, please explain each difference, from a reliability standpoint, of a Domtar or Kimberly-Clark scheduled maintenance outage and a scheduled maintenance outage for a Big Rivers' generating resource.

3-13. Reference Wright Rebuttal at 10, lines 7-11.

a. What is Mr. Wright's understanding of MISO's transmission requirements when the Load Serving Entity meets its planning reserve margin requirement using behind-the-meter generation?

b. What is Mr. Wright's previous experience in rate design?

c. In his role at BREC, is rate design part of Mr. Wright's regular duties?

d. What is Mr. Wright's past experience evaluating and designing standby rates in particular?

e. What is Mr. Wright's past experience evaluating the incentives created by standby rates in particular?

f. How long has Mr. Wright been in his job at Big Rivers?

3-14. Refer to Big Rivers' most recent Integrated Resource Plan ("IRP") filed in Commission Case No. 2023-00310.

a. Was Domtar's MW load included in the load forecast net of Domtar's 50.1 MW generator value or was it included at the total Domtar plant demand without any offset for Domtar's generator? Please provide a complete description of how Domtar's load was quantified for purposes of the Big Rivers' IRP peak load forecast.

b. Did Big Rivers include Domtar's 50.1 MW generator as a generation resource to serve Big Rivers load? If not, please explain how it was considered in Big Rivers' IRP.

c. Was Kimberly-Clark's MW load included in the load forecast net of Kimberly-Clark's generation or was it included in the total Kimberly-Clark plant demand without offset for Kimberly-Clark's generator? Please provide a complete description of how Kimberly-Clark's load was quantified for purposes of the Big Rivers' IRP peak load forecast.

d. Did Big Rivers include Kimberly-Clark's generator as a generation resource to serve Big Rivers load? If not, please explain how it was considered in Big Rivers' IRP.

3-15. With regard to the forecast(s) provided in response to the previous question, 3-14(a)-(d), please provide the following:

a. A description of how Big Rivers develops its load forecast and specifically explain how Domtar's load and Kimberly-Clark's load is calculated for the MISO submission.

b. Does the forecast submitted to MISO (as described above) include the total load of Domtar and/or Kimberly-Clark, excluding any offset for Domtar's or Kimberly-Clark's own generation?

c. If there is an offset for Domtar's and/or Kimberly-Clark's generation, please explain how this is calculated. Also provide a copy of the most recent submission to MISO of

Domtar's load and its generator as well as Kimberly- Clark's load and its generation. Please confirm whether the generation values reflect accredited values.

d. If the response to 3-15(a) above is that the Big Rivers' load forecast does not include any offset for Domtar's and/or Kimberly-Clark's generation, please explain how Domtar's and/or Kimberly-Clark's generators are reflected by MISO in its determination of Big Rivers' generating capacity and Big Rivers' load obligation.

Respectfully submitted,

*/s/Daniel E. Danford (with permission)*
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February 21, 2024