

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)	

**RESPONSE OF KIMBERLY-CLARK CORPORATION TO BIG
RIVERS ELECTRIC CORPORATION AND KENERGY CORP.'S
FIRST JOINT REQUESTS FOR INFORMATION**

Kimberly-Clark Corporation (“Kimberly-Clark”), by counsel, files its responses to Big Rivers Electric Corporation’s and Kenergy Corp.’s (collectively “BREC”) First Requests for Information, filed in the above-captioned matter on December 18, 2023. Kimberly-Clark objects to the ‘Instructions’ and ‘Definitions’ contained in BREC’s First Joint Information Requests to the extent that they seek to impose requirements in addition to those imposed by the rules of the Kentucky Public Service Commission.

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Counsel for Kimberly-Clark Corporation

FILED: January 2, 2024

REQUEST NO. 1-1:

Refer to the testimony of Mr. Blank, page 2, lines 1-5. Please confirm whether Mr. Blank has ever testified before the Kentucky Public Service Commission. If so, please provide the relevant docket numbers.

RESPONSE:

Dr. Blank has not testified before the Kentucky Public Service Commission prior to this case.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-2:

Refer to the testimony of Mr. Blank, pages 1-2. Does Mr. Blank have any 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. Blank has testified in on the subject of standby and maintenance power rates.

RESPONSE:

Yes.

Georgia Public Service Commission, Docket No. 44280, “Georgia Power Company’s 2022 Rate Case,” Direct Testimony filed October 20, 2022.

New Mexico Public Regulation Commission, Case No. 17-00255-UT, “Southwestern Public Service Company’s Application for revision of its Retail Electric Rates,” Direct Testimony filed April 13, 2018, and Rebuttal Testimony filed May 2, 2018.

In addition to these recent cases, Dr. Blank assisted a large power consumer with standby arrangements with Nevada Power Company; worked as a consultant to Hawaiian Electric Company in the design of the first standby service tariff proposed by that company; and worked as the Manager of Regulatory Policy & Market Analysis with the Nevada Public Utilities Commission. Dr. Blank’s division at the Nevada Public Utilities Commission was responsible for all rates and tariffs for every regulated utility within the state of Nevada.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-3:

Did Mr. Blank review any other utility standby rate schedules in conjunction with the development of his direct testimony? If so, please provide the utility name, rate schedule name(s), and a copy of the rate schedule. If not, please explain why not.

RESPONSE:

Yes.

Minnesota Power, Electric Rate Book – Volume I, Rider for Standby Service. A copy is publicly available at the following internet link:

<https://www.mnpower.com/Content/Documents/CustomerService/mp-ratebook.pdf>

Otter Tail Power Company, North Dakota, Section 11.01 Electric Rate Schedule, Standby Service. A copy is publicly available at the following internet link:

https://www.otpc.com/media/0v2gc04u/nd_1101.pdf

Otter Tail Power Company, Minnesota Public Utilities Commission, Section 11.01, Electric Rate Schedule, Standby Service. A copy is publicly available at the following internet link:

https://www.otpc.com/media/asldqv4d/mn_1101.pdf

DTE Electric Company, M.P.S.C. No. 1 – Electric, Standard Contract Rider No. 3, Parallel Operation and Standby Service and Station Power Standby Service, Third Revised Sheet No. D-67 through D-73. A copy is publicly available at the following internet link:

<https://www.michigan.gov/-/media/Project/Websites/mpsc/consumer/rate-books/electric/dte/dtee-retired-and-pole-attachment/dtee10cand1throughend.pdf?rev=168fe2a3c7f7472c9afdeef7c49730ec>

Duke Energy Kentucky, Inc., Rider GSS, Generation Support Service, KY P.S.C. Electric No. 2, Fifth Revised Sheet No. 58. A copy of the current Rider GSS is publicly available at the following internet link:

<https://www.duke-energy.com/-/media/pdfs/rates/ky/sheetno58ridergss.pdf?rev=437059f6dd074e7bbabf75409e80f3ff>

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Georgia Power, Electric Service Tariff, Back-Up Service Schedule: "BU-13". A copy is publicly available at the following internet link:

<https://www.georgiapower.com/content/dam/georgia-power/pdfs/business-pdfs/tariffs/2023/BU-13.pdf>

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-4:

Did Mr. Blank conduct any mathematical, comparative, or similar analysis involving the actual rates paid or to be paid by Kimberly-Clark? Please provide all workpapers in functioning electronic format with formulas intact.

RESPONSE:

Yes.

Dr. Blank calculated projected annual standby demand charges paid under the current pilot LICSS tariff, demand charges to be paid under the BREC-proposed LICSS tariff, and demand charges to be paid under his recommended LICSS tariff. Attached are all confidential workpapers, in functioning electronic format, that support those calculations.

Please see LB Response Exhibit 1-4.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-5:

Identify and describe in detail all efforts, historical and current, with respect to the accreditation of Kimberly-Clark's generator as a behind-the-meter generator with MISO. Please provide all related communications and documents.

RESPONSE:

Kimberly-Clark has undertaken no efforts to accredit Kimberly-Clark's Cogen Unit as a behind-the-meter generator with MISO. All communications and documents regarding any accreditation of Kimberly-Clark's generator as a behind-the-meter generator with MISO are in BREC's possession.

By way of further response, please see the attached TH Response Exhibit 1-5.a and TH Response Exhibit 1-5.b.

Witness: Timothy Honadle, Kimberly-Clark Corporation.

REQUEST NO. 1-6:

Please identify any RTOs from which Kimberly-Clark 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.

RESPONSE:

Kimberly-Clark objects to this question on the grounds of vagueness. It is not clear what is meant by "accreditation" in the context of PJM and ISO-New England, Inc.. Subject to that objection, Kimberly-Clark responds as follows:

Kimberly-Clark has never sought accreditation in any RTO for on-site generation that is entirely behind the meter, as is the case with Cogen Unit at the Owensboro Facility. As such, the subparts of this question are not applicable.

Notwithstanding the foregoing and to ensure a complete record, for the facilities for which Kimberly-Clark has on-site generation that exceeds the Kimberly-Clark load requirements (i.e., Chester, Pennsylvania in PJM Interconnection, L.L.C., and New Milford, Connecticut, in ISO-New England, Inc.), Kimberly-Clark entered the respective RTO interconnection queues and is a party to three-party, FERC-jurisdictional interconnection services agreements in order to make sales of energy

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and capacity in those respective markets that are excess to Kimberly-Clark's requirements.

Witness: Steven Cassady, Kimberly-Clark Corporation

REQUEST NO. 1-7:

Refer to the testimony of Mr. Steven Cassady, page 6, lines 14-16. Please describe in detail the basis for the projected Standby Demand Charges. Please provide all documents and information upon which you relied in connection with this projection, including all workpapers in functioning electronic format with formulas intact.

RESPONSE:

My statement in the above-referenced testimony was based on calculations provided to me by our expert, Larry Blank. For more information about Dr. Blank's calculations, please see Dr. Larry Blank's response to Request No. 1-4, above.

Witness: Steven Cassady, Kimberly-Clark Corporation

REQUEST NO. 1-8:

Refer to the testimony of Mr. Steven Cassady, Exhibit SC-1. Please explain why the exhibit excludes sites with stand-alone on-site generation. Further, please identify and describe each of Kimberly-Clark's listed facilities, including its location, source of energy supply, agreement or tariff pursuant to which it obtains energy, relevant RTO or balancing authority, on-site generation, and detailed electricity cost information by month for the past five (5) years.

RESPONSE:

Kimberly-Clark objects to this inquiry because it is vague, overly broad, and unduly burdensome. This request also seeks information beyond that which is likely to lead to admissible information. Notwithstanding and subject to these objections, Kimberly-Clark responds as follows:

There are three (3) Kimberly-Clark locations in North America that satisfy a significant majority of their power consumption needs utilizing on-site generation. When these locations do purchase power from their local utility/grid, the cost is at a prevailing market rate and cannot be directly compared to the 15 listed sites. For instance, the cost per MWH, when purchased, can vary between \$100 and \$20,000+ at these sites and there are several months within any given year in which the locations purchase no electricity from their local utility/grid.

By way of further response, please see attachments SC Response Exhibit 1-8.

Witness: Steven Cassady, Kimberly-Clark Corporation

REQUEST NO. 1-9:

Refer to the testimony of Mr. Timothy Honadle, page 11, lines 5-11. Please explain what is meant by “more efficient” in line 10. Is it Kimberly-Clark’s contention that if backup demand cost was proportional to backup energy actually delivered, Kimberly-Clark would operate less during forced and planned outages?

RESPONSE:

In this context, “more efficient” means reducing demand on the grid/BREC and meeting more of the Owensboro Facility’s power needs through on-site generation, especially during times when the grid otherwise may be stressed (such as during peak summer and winter demand periods). Because the structure of the demand charge under the pilot tariff is a monthly flat rate, regardless of how long a planned or unplanned outage may continue during that month, the structure of the demand charge does not provide an incentive for the customer to return its on-site generation to service or otherwise minimize its reliance on the grid following a planned or unplanned outage during that month.

Structuring the backup demand charge to be proportional to the actual additional energy consumed during a planned or unplanned on-site generation outage would eliminate the efficiency disincentive that is inherent in the structure of the backup demand charges in the current and proposed LICSS tariffs.

Witness: Timothy Honadle, Kimberly-Clark Corporation

REQUEST NO. 1-10:

Refer to the testimony of Mr. Larry Blank, page 5, lines 7-14. Please identify and describe, in detail, the 50% of standard monthly demand costs that a utility does not incur in connection with backup demand that the utility does incur in connection with “standard demand.” Please provide all documents and information upon which you relied in connection with this projection, including all workpapers in functioning electronic format with formulas intact.

RESPONSE:

The referenced portion of testimony in this request pertains to maintenance service, not backup service. With that clarification, the standard demand charge is an average cost rate, spread out over the entire year and not designed to capture the incremental or marginal cost associated with capacity. Because maintenance service should be scheduled and coordinated with BREC during off-peak times of the year, the incremental capacity cost should be zero or close to zero because of excess system capacity during those times. Therefore, the use of 50% of the demand charge for the design of a maintenance service charge is conservatively high.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-11:

Refer to the testimony of Mr. Larry Blank, page 8, lines 15-18. Please explain whether and why Kimberly-Clark believes backup demand charges should disincentivize use of backup power.

RESPONSE:

Firm generation capacity has greater system value than non-firm capacity. Standby service customers such as Kimberly-Clark bring firm capacity that not only benefits Kimberly-Clark but also provides reliability benefits to the BREC system as a whole in terms of reduced transmission and generation capacity needed during times of system emergencies. Encouraging customer generators to use backup power at any time for no additional charge is inefficient and reduces the value of the customer generation capacity.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-12:

Refer to the testimony of Mr. Larry Blank, pages 8-9, lines 20-2. Under the hypothetical presented, does Kimberly-Clark believe it would not pay any demand charge in connection with its use of power?

RESPONSE:

The above request refers to the hypothetical I proposed in my testimony as follows:

“If a customer could bid their capacity into a reserve capacity market at some point in the future, a customer may be economically enticed to simply use Big Rivers power with no additional demand charge (just energy charges) and sell capacity into the market. These perverse standby customer incentives under the proposed LICSS may cause system instability and jeopardize system reliability.”

As I understand the design of the BREC-proposed LICSS, the customer pays the full LIC demand charge every month on the customer’s kW generation capacity whether they use the power or not. The customer would then get a bill credit on that kW capacity equal to the Planning Resource Auction market price.

The hypothetical illustrates the fact that the proposed LICSS provides no incentive to reduce reliance on backup power because the customer is paying the demand charge whether they need the power or not.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-13:

Refer to the testimony of Mr. Larry Blank, page 9, lines 4-10.

- i. Explain why “customer generator reliability is important to system reliability.”
- ii. Does a customer’s generator’s reliability impact utility system reliability if the utility has designed and maintained its system and forecasted its load to ensure fully-sufficient, reliable, cost-effective power is available to that customer generator, irrespective of the customer’s generator’s reliability?

RESPONSE:

The addition of reliable firm generation capacity, regardless of ownership, brings added reliability to the system as a whole because there is more capacity to meet load during normal operating times and during system emergencies. Customer generators bring additional reliability because it not only adds generation capacity to the system, it also adds available transmission capacity because the customer generator’s load on the utility grid is reduced. The capacity planning by the utility does not change the fact that the customer’s generation capacity adds system reliability.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-14:

Refer to the testimony of Mr. Larry Blank, page 10, lines 14-21. If Big Rivers and/or Kenergy relies on a customer's Generator Outage Rate 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? Please explain in detail.

RESPONSE:

The Generator Outage Rate will be updated annually and, therefore, under the tariff structure recommended by Kimberly-Clark, the standby customer will pay more for less reliable performance.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-15:

Refer to the testimony of Mr. Larry Blank, page 14, lines 6-10. Explain the difference to Big Rivers and/or Kenergy with respect to demand costs between providing backup service to “a customer with a five minute outage [and] the same customer with a 5 day outage.” Additionally, explain why the price per kW charged by Big Rivers and/or Kenergy should “distinguish between customers with frequent outages versus customers with no outages.”

RESPONSE:

The difference is that the cost of procuring capacity for longer duration outages and more frequent outages is greater.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-16:

Does Kimberly-Clark believe a utility incurs demand-related costs in connection with the provision of maintenance power that are not already incurred in connection with the utility's provision of backup power? If not, explain the need for separate rates.

RESPONSE:

Because maintenance power will be scheduled in coordination with BREC, the cost of providing maintenance power is different and should be distinguished from the cost of providing backup power. The construction of standby tariffs that include separate supplementary power, back-up power, and maintenance power has its origins within the Public Utility Regulatory Policies Act of 1978 ("PURPA") and regulations promulgated by the Federal Energy Regulatory Commission to implement PURPA. See 18 CFR Ch. I § 292, and, in particular, § 292.305.

Witness: Larry Blank, TAHOEconomics, LLC

REQUEST NO. 1-17:

Please provide a copy of any agreement between Kimberly-Clark and Mr. Blank.

RESPONSE:

No such agreement exists between Kimberly-Clark and Dr. Blank. Dr. Blank has been engaged through Kimberly-Clark's counsel.


Witness: Larry Blank, TAHOEconomics, LLC

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FOR INFORMATION**

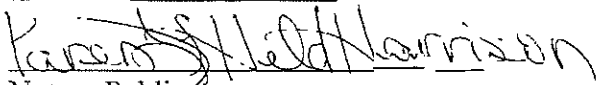
I, Larry Blank, verify, state, and affirm that the responses to the information requests filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.



Larry Blank
Principal, TAHOEconomics, LLC

STATE OF Minnesota)
) ss.
COUNTY OF Wright)

Subscribed and sworn to before me on this 19 day of Dec, 2023.



Notary Public

My commission expires: 1.31.2025



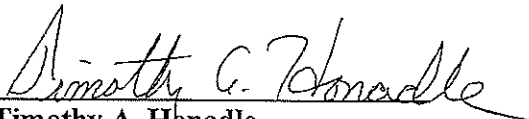
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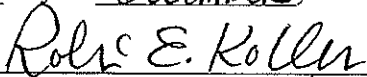
**RESPONSE OF KIMBERLY-CLARK CORPORATION TO BIG RIVERS
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I, Timothy A. Honadle, verify, state, and affirm that the responses to the information requests filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.


Timothy A. Honadle
Engineering Technical Leader
Kimberly-Clark Corporation

STATE OF Kentucky)
)
 COUNTY OF Daviess) ss.

Subscribed and sworn to before me on this 20 day of December, 2023.


 Notary Public Robin E. KOLLER

My commission expires: May 8, 2025

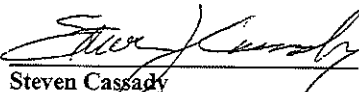
ROBIN E KOLLER Notary Public - State at Large Kentucky My Commission Expires May 8, 2025 Notary ID KYNP29062
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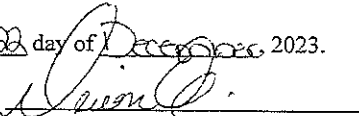
RESPONSE OF KIMBERLY-CLARK CORPORATION TO BIG RIVERS
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FOR INFORMATION

I, Steven Cassady, verify, state, and affirm that the responses to the information requests 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 reasonable inquiry.

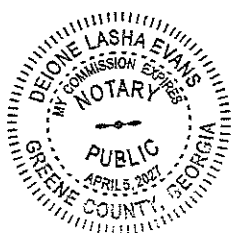

Steven Cassady
Senior Director of Procurement
Kimberly-Clark Corporation

STATE OF Georgia)
) ss.
COUNTY OF Greene)

Subscribed and sworn to before me on this 22 day of December, 2023.


Notary Public

My commission expires: 4-5-2027



CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Kentucky Public Service Commission on January 2, 2024; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and, by virtue of the Commission Order of July 22, 2021 in case number 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), no paper copies of this filing will be made.

/s/ Daniel E. Danford

Daniel E. Danford

Counsel for Kimberly-Clark Corporation

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LB Response Exhibit 1-4

INFORMATION SUBMITTED IN EXCEL
FORMAT WITH MOTION FOR
CONFIDENTIAL TREATMENT

[REDACTED]
Sent: Monday, August 12, 2019 12:58 PM

[REDACTED]
Subject: FW: [EXT] BTM Generation - MISO and Big Rivers

[REDACTED]

YOU
SUSTAINABILITY
2022

[REDACTED]
Sent: Monday, August 12, 2019 12:54 PM

[REDACTED]
Subject: FW: [EXT] BTM Generation

CAUTION: This email originated from outside the organization.

[REDACTED]

[REDACTED]
Sent: Friday, August 09, 2019 9:20 AM

[REDACTED]
Subject: RE: [EXT] BTM Generation

[REDACTED]

Sent: Thursday, August 1, 2019 3:40 PM

[REDACTED]

Subject: RE: [EXT] BTM Generation

External E-mail: Please be cautious and evaluate before you click on links, open attachments, or provide credentials or data.

[REDACTED]

Sent: Thursday, August 01, 2019 3:20 PM

[REDACTED]

Subject: RE: [EXT] BTM Generation

[REDACTED]

[REDACTED]

Sent: Thursday, August 1, 2019 1:22 PM

[REDACTED]

Subject: RE: [EXT] BTM Generation

External E-mail: Please be cautious and evaluate before you click on links, open attachments, or provide credentials or data.

[REDACTED]

[REDACTED]

Sent: Tuesday, June 04, 2019 8:50 AM

[REDACTED]

Subject: RE: [EXT] BTM Generation

[REDACTED]

[REDACTED]

Sent: Monday, June 3, 2019 2:00 PM

[REDACTED]

Subject: RE: [EXT] BTM Generation

External E-mail: Please be cautious and evaluate before you click on links, open attachments, or provide credentials or data.

[REDACTED]

[REDACTED]
[REDACTED]
Sent: Tuesday, April 23, 2019 9:29 AM

[REDACTED]
Subject: RE: [EXT] BTM Generation

[REDACTED]

[REDACTED]
Sent: Tuesday, April 23, 2019 9:00 AM

[REDACTED]
Subject: RE: [EXT] BTM Generation

[REDACTED]

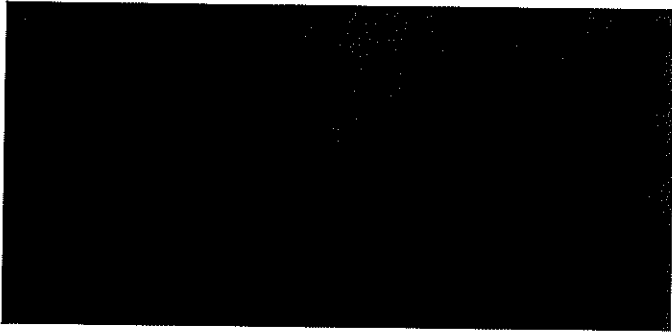
[REDACTED]
Sent: Monday, April 22, 2019 4:30 PM

[REDACTED]
Subject: [EXT] BTM Generation

External E-mail: Please be cautious and evaluate before you click on links, open attachments, or provide credentials or data.

CONFIDENTIAL

TH Response Exhibit 1-5.a



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[REDACTED]
Sent: Thursday, November 3, 2022 1:33 PM

[REDACTED]
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[REDACTED]
K-C Internal Only

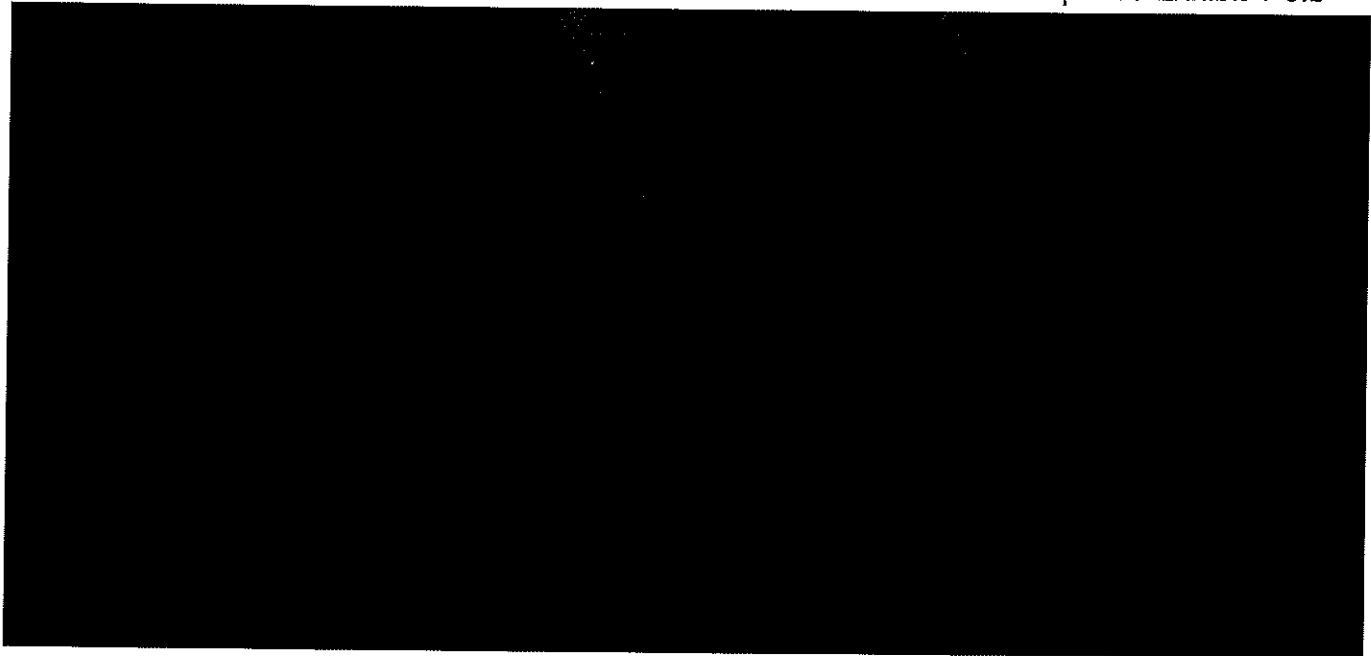
[REDACTED]
Sent: Monday, October 10, 2022 2:09 PM

[REDACTED]
Subject: RE: K-C Generation Registration in MISO

CAUTION: This email originated from outside the organization.

[REDACTED]
Sent: Monday, October 3, 2022 2:22 PM

[REDACTED]
Subject: K-C Generation Registration in MISO



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SC Response Exhibit 1-8

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