

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)	

**JOINT RESPONSE OF BIG RIVERS ELECTRIC CORPORATION
AND KENERGY CORP. TO DOMTAR PAPER COMPANY, LLC'S
SECOND REQUEST FOR INFORMATION**

Big Rivers Electric Corporation (“Big Rivers”) and Kenergy Corp. (“Kenergy”), by counsel, file their joint responses to Domtar Paper Company, LLC’s Second Request for Information, issued in the above-captioned case on November 13, 2023.

FILED: November 27, 2023

IN THE MATTER OF:
ELECTRONIC TARIFF FILING OF BIG RIVERS ELECTRIC CORPORATION
AND KENERGY CORP. TO REVISE THE
LARGE INDUSTRIAL CUSTOMER STANDBY SERVICE TARIFF
CASE NO. 2023-00312

JOINT RESPONSE OF BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.
TO DOMTAR PAPER COMPANY, LLC'S SECOND REQUEST FOR INFORMATION

REQUEST NO. 2-1: *Refer to Big Rivers' response to Domtar 1-2(b).*

- a. *Is it Big Rivers' position that it does not know the base amount of fuel included in its own tariff LIC?*
- b. *Is it correct that the FAC assumes that the base amount of fuel in tariff LIC is \$0.020932 per kWh? If this is not correct, please fully explain your response.*

RESPONSE:

- a. No; the intent of the response was to note that the base amount of fuel was not determined in the cost of service study provided with the response to Domtar 1-2(b).
- b. Yes.

Witness: John Wolfram

IN THE MATTER OF:
ELECTRONIC TARIFF FILING OF BIG RIVERS ELECTRIC CORPORATION
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REQUEST NO. 2-2: *Please provide the updated cost of service studies in electronic format (Excel) with all formulas intact referred to in Big Rivers' response to Domtar 1-3. Also include all supporting workpapers, including all Excel workbooks used to develop each study.*

RESPONSE: Please see the Joint Response to Request No. 3 of Kimberly-Clark's Second Request for Information filed in this matter.

Witness: John Wolfram

IN THE MATTER OF:
ELECTRONIC TARIFF FILING OF BIG RIVERS ELECTRIC CORPORATION
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JOINT RESPONSE OF BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.
TO DOMTAR PAPER COMPANY, LLC'S SECOND REQUEST FOR INFORMATION

REQUEST NO. 2-3: *Refer to Big Rivers' response to Domtar 1-6. For each of the standby tariffs that Big Rivers' reviewed, as listed in its response to Domtar 1-6, please identify the reasons that Big Rivers did not consider such standby tariff applicable to Big Rivers. In particular, please explain why Big Rivers' did not use the approach approved by the Commission for Duke Energy Kentucky.*

RESPONSE: Big Rivers did not develop and document specific reasons for not adopting each of the standby tariffs listed in response to Domtar 1-6. Big Rivers did conclude that its participation in the MISO markets differentiated it from the other tariffs that it reviewed, including that of Duke Energy Kentucky.

Witness: John Wolfram

IN THE MATTER OF:
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JOINT RESPONSE OF BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.
TO DOMTAR PAPER COMPANY, LLC'S SECOND REQUEST FOR INFORMATION

REQUEST NO. 2-4: *Refer to Big Rivers' response to Domtar 1-7. Please explain what Big Rivers means by the following statement: "Upon determining its approach, Big Rivers developed the filed rate schedule." In particular what does "upon determining its approach" mean.*

RESPONSE: This statement simply means that Big Rivers determined how it believed the tariff should work to avoid increased cost to its other members.

Witness: John Wolfram

IN THE MATTER OF:
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REQUEST NO. 2-5: *Refer to Big Rivers' response to Domtar 1-5. Please provide a narrative explaining the steps that Big Rivers undertook to determine that no other utilities have standby and maintenance tariffs similar to Big Rivers' proposed LICSS.*

RESPONSE: Big Rivers did not state that no other utilities have standby and maintenance tariffs similar to the proposed LICSS. Big Rivers stated that it is not aware of other utilities that have standby schedules similar to the proposed LICSS.

Witness: John Wolfram

IN THE MATTER OF:
ELECTRONIC TARIFF FILING OF BIG RIVERS ELECTRIC CORPORATION
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TO DOMTAR PAPER COMPANY, LLC'S SECOND REQUEST FOR INFORMATION

REQUEST NO. 2-6: *Refer to Big Rivers' response to Domtar 1-4. Please provide a description of the specific experience of Mr. Wolfram in the development of a standby and maintenance power rate. Include case or docket numbers of regulatory proceedings that Mr. Wolfram has testified in on the subject of standby and maintenance power rates.*

RESPONSE: Attached to this response is a copy of Mr. Wolfram's professional summary, which provides a list of the proceedings in which Mr. Wolfram has provided testimony.

Witness: John Wolfram

JOHN WOLFRAM

Summary of Qualifications

Provides consulting services to investor-owned utilities, rural electric cooperatives, and municipal utilities regarding utility rate and regulatory filings, cost of service studies, wholesale and retail rate designs, tariffs and special contracts, formula rates, and other analyses.

Employment

CATALYST CONSULTING LLC
Principal

June 2012 – Present

Provide consulting services in the areas of tariff development, formula rates, regulatory analysis, economic development, revenue requirements, cost of service, rate design, special rates, audits, rate filings, and other utility regulatory areas.

THE PRIME GROUP, LLC
Senior Consultant

March 2010 – May 2012

LG&E and KU, Louisville, KY

1997 - 2010

(Louisville Gas & Electric Company and Kentucky Utilities Company)
Director, Customer Service & Marketing (2006 - 2010)
Manager, Regulatory Affairs (2001 - 2006)
Lead Planning Engineer, Generation Planning (1998 - 2001)
Power Trader, LG&E Energy Marketing (1997 - 1998)

PJM INTERCONNECTION, LLC, Norristown, PA
Project Lead – PJM OASIS Project
Chair, Data Management Working Group

1990 - 1993; 1994 - 1997

CINCINNATI GAS & ELECTRIC COMPANY, Cincinnati, OH
Electrical Engineer - Energy Management System

1993 - 1994

Education

Bachelor of Science Degree in Electrical Engineering, University of Notre Dame, 1990
Master of Science Degree in Electrical Engineering, Drexel University, 1997
Leadership Louisville, 2006

Associations

Senior Member, Institute of Electrical and Electronics Engineers (“IEEE”) & Power Engineering Society

Articles

“FERC Formula Rate Resurgence” *Public Utilities Fortnightly*, Vol. 158, No. 9, July 2020, 34-37.

“Economic Development Rates: Public Service or Piracy?” *IAEE Energy Forum*, International Association for Energy Economics, 2016 Q1 (January 2016), 17-20.

Presentations

“Cooperative Rate Cases” presented to Kentucky Electric Cooperatives Fall Managers’ Meeting, Oct. 2023.

“New Developments in Kentucky Rate Filings” presented to Kentucky Electric Cooperatives Accountants’ Association Summer Meeting, Jun. 2022.

“Avoiding Shock: Communicating Rate Changes” presented to APPA Business & Financial Conference, Sep. 2020.

“Revisiting Rate Design Strategies” presented to APPA Public Power Forward Summit, Nov. 2019.

“Utility Rates at the Crossroads” presented to APPA Business & Financial Conference, Sep. 2019.

“New Developments in Kentucky Rate Filings” presented to Kentucky Electric Cooperatives Accountants’ Association Summer Meeting, Jun. 2019.

“Electric Rates: New Approaches to Ratemaking” presented to CFC Statewide Workshop for Directors, Jan. 2019.

“The Great Rate Debate: Residential Demand Rates” presented to CFC Forum, Jun. 2018.

“Benefits of Cost of Service Studies” presented to Tri-State Electric Cooperatives Accountants’ Association Spring Meeting, Apr. 2017.

“Proper Design of Utility Rate Incentives” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2017.

“Utility Hot Topics and Economic Development” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2017.

“Emerging Rate Designs” presented to CFC Independent Borrowers Executive Summit, Nov. 2016.

“Optimizing Economic Development” presented to Grand River Dam Authority Municipal Customer Annual Meeting, Sept. 2016.

“Tomorrow’s Electric Rate Designs, Today” presented to CFC Forum, Jun. 2016.

“Reviewing Rate Class Composition to Support Sound Rate Design” presented to EEI Rate and Regulatory Analysts Group Meeting, May 2016.

“Taking Public Power Economic Development to the Next Level” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2016.

“Ratemaking for Environmental Compliance Plans” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2015.

“Top Utility Strategies for Successful Attraction, Retention & Expansion” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2015.

“Economic Development and Load Retention Rates” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2013.

Expert Witness Testimony & Proceedings

FERC

Submitted direct testimony for Black Hills Colorado Electric, LLC in FERC Docket No. ER22-2185 regarding a proposed Transmission Formula Rate.

Submitted testimony for Evergy Kansas Central, Inc. and Evergy Generating, Inc. in FERC Docket Nos. ER22-1974-000, ER22-1975-000 and ER22-1976-000 regarding revised capital structures under transmission and generation formula rates.

Submitted affidavit for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-000 in response to arguments raised in formal challenges to an informational filing required for a cost-of-service rate for the operation of power plants in ISO New England.

Submitted direct testimony for El Paso Electric Company in FERC Docket No. ER22-282 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for TransCanyon Western Development, LLC in FERC Docket No. ER21-1065 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cleco Power LLC in FERC Docket No. ER21-370 regarding a proposed rate schedule for Blackstart Service under Schedule 33 of the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff.

Submitted direct testimony for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-005 supporting a compliance filing for a cost-of-service rate for compensation for the continued operation of power plants in ISO New England.

Submitted direct testimony for DATC Path 15, LLC in FERC Docket No. ER20-1006 regarding a proposed wholesale transmission rate.

Submitted direct testimony for Tucson Electric Power Company in FERC Docket No. ER19-2019 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cheyenne Light, Fuel & Power Company in FERC Docket No. ER19-697 regarding a proposed Transmission Formula Rate.

Supported Kansas City Power & Light in FERC Docket No. ER19-1861-000 regarding revisions to fixed depreciation rates in the KCP&L SPP Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket No. ER19-269-000 regarding revisions to fixed depreciation rates in the Westar SPP Transmission Formula Rate.

Submitted direct testimony for Midwest Power Transmission Arkansas, LLC in FERC Docket No. ER15-2236 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Kanstar Transmission, LLC in FERC Docket No. ER15-2237 regarding a proposed Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket Nos. FA15-9-000 and FA15-15-000 regarding an Audit of Compliance with Rates, Terms and Conditions of Westar's Open Access Transmission Tariff and Formula Rates, Accounting Requirements of the Uniform System of Accounts, and Reporting Requirements of the FERC Form No. 1.

Submitted direct testimony for Westar Energy in FERC Docket Nos. ER14-804 and ER14-805 regarding proposed revisions to a Generation Formula Rate.

Supported Intermountain Rural Electric Association and Tri-State G&T in FERC Docket No. ER12-1589 regarding revisions to Public Service of Colorado's Transmission Formula Rate.

Supported Intermountain Rural Electric Association in FERC Docket No. ER11-2853 regarding revisions to Public Service of Colorado's Production Formula Rate.

Supported Kansas Gas & Electric Company in FERC Docket No. FA14-3-000 regarding an Audit of Compliance with Nuclear Plant Decommissioning Trust Fund Regulations and Accounting Practices.

Supported LG&E Energy LLC in FERC Docket No. PA05-9-000 regarding an Audit of Code of Conduct, Standards of Conduct, Market-Based Rate Tariff, and MISO's Open Access Transmission Tariff at LG&E Energy LLC.

Submitted remarks and served on expert panel in FERC Docket No. RM01-10-000 on May 21, 2002 in Standards of Conduct for Transmission Providers staff conference, regarding proposed rulemaking on the functional separation of wholesale transmission and bundled sales functions for electric utilities.

Kansas

Submitted direct and rebuttal testimony for Evergy Metro, Inc. in Docket No. 23-EKCE-775-RTS regarding a jurisdictional cost allocation in a retail rate case.

Submitted report for Westar Energy, Inc. in Docket No. 21-WCNE-103-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-WSEE-328-RTS regarding overall rate design, prior rate case settlement commitments, lighting tariffs, an Electric Transit rate schedule, Electric Vehicle charging tariffs, and tariff general terms and conditions.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-KG&E-303-CON regarding the Evaluation, Measurement and Verification ("EM&V") of an energy efficiency demand response program offered pursuant to a large industrial customer special contract.

Submitted report for Westar Energy, Inc. in Docket No. 18-WCNE-107-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 15-WSEE-115-RTS regarding rate designs for large customer classes, establishment of a balancing account related to new rate options, establishment of a tracking mechanism for costs related to compliance with mandated cyber and physical security standards, other rate design issues, and revenue allocation.

Kentucky

Adopted direct testimony on behalf of Kentucky Power Company in Case No. 2023-00159 regarding the zero intercept analysis in a base rate case.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2023-00285 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Kenergy Corp. in Case No. 2023-00276 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Fleming-Mason Energy Corporation in Case No. 2023-00223 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Shelby Energy Cooperative in Case No. 2023-00213 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony on behalf of Farmers RECC in Case No. 2023-00158 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Taylor County RECC in Case No. 2023-00147 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. TFS 2023-00124 regarding a Qualifying Facilities tariff.

Submitted tariff worksheets and responses to data requests on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2023-00135 regarding rate design for the pass-through of an approved wholesale earning mechanism bill credit.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Kenergy Corp. in Case No. 2023-00045 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2021-00358 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2021-00289 regarding a Large Industrial Customer Standby Service Tariff.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation in Case No. 2021-00282 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct testimony, responses to data requests, and rebuttal testimony on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case Nos. 2021-00104 through 2021-00119 regarding rate design for the pass-through of a proposed wholesale rate revision.

Submitted direct testimony and responses to data requests on behalf of Kenergy Corp. in Case No. 2021-00066 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2021-00061 regarding two cost of service studies in a review of the Member Rate Stability Mechanism Charge for calendar year 2020.

Submitted direct testimony and responses to data requests on behalf of Licking Valley R.E.C.C. in Case No. 2020-00338 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Cumberland Valley Electric in Case No. 2020-00264 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Taylor County R.E.C.C. in Case No. 2020-00278 regarding the cost support and tariff changes for the implementation of a Prepay Metering Program.

Submitted direct testimony and responses to data requests on behalf of Meade County R.E.C.C. in Case No. 2020-00131 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Clark Energy Cooperative in Case No. 2020-00104 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2019-00435 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct testimony and responses to data requests on behalf of Jackson Energy Cooperative in Case No. 2019-00066 regarding revenue requirements, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2019-00053 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and data request responses on behalf of Big Rivers Electric Corporation in Case No. 2018-00146 regarding ratemaking issues associated with the anticipated termination of contracts regarding the operation of an electric generating plant owned by the City of Henderson, Kentucky.

Submitted direct testimony on behalf of fifteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2018-00050 regarding the economic evaluation of and potential cost shift resulting from a proposed member purchased power agreement.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2017-00374 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony on behalf of Progress Metal Reclamation Company in Kentucky Power Company Case No. 2017-00179 regarding the potential implementation of a Load Retention Rate or revisions to an Economic Development Rate.

Submitted direct testimony on behalf of Kenergy Corp. and Big Rivers Electric Corporation in Case No. 2016-00117 regarding a marginal cost of service study in support of an economic development rate for a special contracts customer.

Submitted rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2014-00134 regarding ratemaking treatment of revenues associated with proposed wholesale market-based-rate purchased power agreements with entities in Nebraska.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2013-00199 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00535 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00063 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct, rebuttal, and rehearing direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2011-00036 regarding revenue requirements and pro forma adjustments in a base rate case.

Submitted direct testimony for Louisville Gas & Electric Company in Case No. 2009-00549 and for Kentucky Utilities Company in Case No. 2009-00548 for adjustment of electric and gas base rates, in support of a new service offering for Low Emission Vehicles, revised special charges, and company offerings aimed at assisting customers.

Submitted discovery responses for Kentucky Utilities and/or Louisville Gas & Electric Company in various customer inquiry matters, including Case Nos. 2009-00421, 2009-00312, and 2009-00364.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2008-00148 regarding the 2008 Joint Integrated Resource Plan.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Administrative Case No. 2007-00477 regarding an investigation of the energy and regulatory issues in Kentucky's 2007 Energy Act.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00319 for the review, modification, and continuation of Energy Efficiency Programs and DSM Cost Recovery Mechanisms.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00067 for approval of a proposed Green Energy program and associated tariff riders.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00467 and 2005-00472 regarding a Certificate of Public Convenience and Necessity for the construction of transmission facilities.

Submitted discovery responses for Kentucky Utilities in Case No. 2005-00405 regarding the transfer of a utility hydroelectric power plant to a private developer.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00162 for the 2005 Joint Integrated Resource Plan.

Presented company position for Louisville Gas & Electric Company and Kentucky Utilities Company at public meetings held in Case Nos. 2005-00142 and 2005-00154 regarding routes for proposed transmission lines.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of Fuel Procurement practices by Liberty Consulting in 2004.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in an Investigation into their Membership in the Midwest Independent Transmission System Operator, Inc. ("MISO") in Case No. 2003-00266.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of its Earning Sharing Mechanism by Barrington-Wellesley Group in 2002-2003.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00381 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00029 regarding a Certificate of Public Convenience and Necessity for the acquisition of two combustion turbines.

Missouri

Submitted direct, rebuttal and surrebuttal testimony for Evergy Metro, Inc. in Case No. ER-2022-0130 regarding a jurisdictional cost allocation analysis in a retail rate case.

Virginia

Submitted direct testimony for Kentucky Utilities Company d/b/a Old Dominion Power in Case No. PUE-2002-00570 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

IN THE MATTER OF:
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JOINT RESPONSE OF BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.
TO DOMTAR PAPER COMPANY, LLC'S SECOND REQUEST FOR INFORMATION

REQUEST NO. 2-7: *Refer to Big Rivers' response to Domtar 1-4. Please provide a description of the specific experience of each of the individuals listed in response to Part (a) with regard to the development of a standby and maintenance power rate. Include case or docket numbers of regulatory proceedings that each individual has testified in on the subject of standby and maintenance power rates.*

RESPONSE: Big Rivers does not have a list of the relevant experience for individuals who are no longer actively employed with Big Rivers, including Mr. Smith, Mr. Eacret, Mr. Repsher, Mr. Pullen, and Mr. Chambliss. Mr. Berry and Mr. Kamuf were involved in the development of the existing LICSS tariff.

Witness: Terry Wright, Jr. (Big Rivers)

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REQUEST NO. 2-8: *Refer to Big Rivers' response to Domtar 1-16. Please confirm that Big Rivers is unable and/or unwilling to provide to Domtar or the Kentucky Public Service Commission the impact of its LICSS rate proposal on Domtar, a standby and maintenance power customer of Big Rivers. If Big Rivers can provide the requested information, please provide it together with all assumptions and supporting workpapers.*

RESPONSE: Big Rivers' original objections to this request remain, as this request is unduly burdensome. Big Rivers further objects to the extent this request seeks information, or requires Big Rivers to create information, that is readily or more accessible to Domtar Paper Company, LLC from itself or other sources. Subject to the foregoing, Big Rivers again states that an accurate projection requires information (including third-party cost information) not available to Big Rivers, including information that is not regularly maintained, compiled, or prepared by Big Rivers. The tariff proposed by Big Rivers includes the bases for charges to customers thereunder. Certain charges—including those passed through from third parties—are not presently known to or knowable by Big Rivers, due in part to new and oft-changing requirements and frameworks employed by MISO, particularly as those impact customer-owned generation resources. The Company welcomes the opportunity to work cooperatively with customers and prospective customers in connection with billing and related issues; however, it is neither reasonable nor effective for Big Rivers to undertake the speculative analysis required by this request.

IN THE MATTER OF:
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TO DOMTAR PAPER COMPANY, LLC'S SECOND REQUEST FOR INFORMATION

Witness: Terry Wright, Jr. (Big Rivers)

For the Objection(s): Counsel

IN THE MATTER OF:
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REQUEST NO. 2-9: *Refer to Big Rivers response to Domtar 1-16. Does Big Rivers believe that it is reasonable to propose an entirely new tariff that would be applicable to existing customers without providing any information regarding the impact of its proposed tariff on the impacted customers? If Big Rivers believes that it is reasonable to do so, please provide an explanation supporting its response. In particular, how does Big Rivers believe that the Kentucky PSC should evaluate its proposal without providing any estimated impact on the Domtar, who has taken standby and maintenance power for [sic] Big Rivers for many years?*

RESPONSE: See Big Rivers' response and objections to Domtar 1-16. Further, Domtar 1-16 does not simply request Big Rivers to provide the impact of the proposed tariff on Domtar. Domtar 1-16 asks Big Rivers to project Domtar's annual power cost, which would require Big Rivers to project, among other things, each hour during the year when Domtar's cogeneration is producing less than its accredited capacity, to project how much energy cogeneration is producing in each such hour, and then to project how MISO locational marginal prices compare to Big Rivers' LIC energy rate in each such hour. As such, Big Rivers objects to this request as unduly burdensome. Big Rivers further objects to the extent this request seeks information, or requires Big Rivers to create information, that is readily or more accessible to Domtar Paper Company, LLC from itself or other sources, including information related to Domtar's cost to run its cogeneration facility compared to forecasted market prices; and its cogeneration's planned outages.

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KRS 278.170(1) prohibits unreasonable discrimination as to rates or service. The existing LICSS tariff was not approved for a single customer, and the proposed LICSS tariff is designed to provide a default rate for any existing or future qualifying large industrial customers on the Big Rivers system that seeks backup power service. For Standby Service, the proposed tariff ensures that a Standby Customer pays the same generally applicable LIC tariff rates paid by other large industrial customers.

For Backup Power Service, the proposed tariff ensures that a Standby Customer pays the generally applicable LIC demand rate applied to the amount of backup power the Standby Customer expects Big Rivers and Kenergy to maintain the capability to provide at any time, while passing through to the Standby Customer any credit received for the value of the customer's self-generation capacity. The energy rate for Backup Power Service is the greater of the LIC energy charge or the market cost, which ensures that Big Rivers recovers its costs for Backup Power Service.

Big Rivers believes the proposed rates are reasonable because they utilize the same LIC rates approved by the Commission for other large industrial customers, while both (i) protecting Big Rivers, its Members, and other customers on the Members' systems from the cost to provide Backup Power Service, and (ii) passing through to the Standby Customer the benefits received by Big Rivers as a result the Standby Customer's cogeneration.

Witness: Terry Wright, Jr. (Big Rivers)

Case No. 2023-00312
Response to DPC 2-9
Witness: Terry Wright, Jr.
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