

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF BIG RIVERS	)	
ELECTRIC CORPORATION AND KENERGY	)	CASE NO.
CORP. TO IMPLEMENT A NEW STANDBY	)	2021-00289
SERVICE TARIFF	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.

Big Rivers Electric Corporation (BREC) and Kenergy Corp. (Kenergy), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on October 1, 2021. The Commission directs BREC and Kenergy to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

BREC and Kenergy shall make timely amendment to any prior response if BREC and Kenergy obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which BREC and Kenergy fail or refuse to furnish all or part of the requested information, BREC and Kenergy shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, BREC and Kenergy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Explain whether, absent the proposed Large Industrial Customer Standby Service Tariff, large industrial customers could receive supplemental, maintenance, or backup power service from BREC and its member cooperatives. If so, explain why the proposed Large Industrial Customer Standby Service Tariff is necessary.

2. Confirm that customers taking service under the proposed Large Industrial Customer Standby Service Tariff would not also be able to take service under BREC's Cogeneration/Small Power Production Sales Tariff. If not confirmed, explain.

3. Refer to the Commission's January 13, 2021 Order in Case No. 2020-00174<sup>2</sup> in which the Commission found that the avoided capacity rate in Kentucky Power's Qualifying Facility tariff should be the zonal net cost of new entry (CONE) for the delivery years that have an established CONE at the time of the contract and the last known net CONE for the remainder of the term.

a. Explain why the Midcontinent Independent System Operator (MISO) CONE would not be an appropriate amount for the capacity credit under the proposed Large Industrial Customer Standby Service Tariff.

b. Provide the amount of the most recent MISO CONE for a combustion turbine on a kW-month basis.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED SEP 16 2021

cc: Parties of Record

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<sup>2</sup> See Case No 2020-00174, *Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) Approval of a Certificate of Public Convenience and Necessity; and (5) all Other Required Approvals and Relief* (Ky. PSC Jan. 13, 2021), final Order at 99–101.

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