



Big Rivers Electric Corporation
710 West 2nd Street
Owensboro, KY 42301
www.bigrivers.com

Case No. 2023-00312

September 1, 2023

VIA Electronic Tariff Filing System

Ms. Linda C. Bridwell
Executive Director
Public Service Commission
211 Sower Boulevard, P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: *Large Industrial Customer Standby Service Tariff Filing of Big Rivers Electric Corporation* – TFS No. 2023-_____

Dear Ms. Bridwell:

Pursuant to the Kentucky Public Service Commission's ("*Commission*") March 3, 2022, Order in Case No. 2021-00289, Big Rivers Electric Corporation ("*Big Rivers*") is filing with this letter, using the Commission's Electronic Tariff Filing System, proposed tariff sheets to revise its Large Industrial Customer Standby Service rate schedule. The Standby Service rate schedule is available to any Big Rivers' existing Member Cooperative for service to any large industrial customer of the Member Cooperative with resources capable of supplying all or a portion of the customer's power requirements who request Standby Service Power. Big Rivers is also filing with this letter supporting testimony.

On this date, Big Rivers has provided notice of this tariff filing to its three Members – Jackson Purchase Energy Corporation, Kenergy Corp., and Meade County Rural Electric Cooperative Corporation – by mailing them a copy of this letter and the other documents being filed with this letter, including the proposed tariff sheets. See 807 KAR 5:011 Section 8(2)(a). An affidavit from an authorized Big Rivers representative verifying the contents of the customer notice, that the notice was mailed to all customers, and the date of the mailing is being filed with this letter. See 807 KAR 5:011 Section 8(3)(a).

Ms. Linda C. Bridwell
September 1, 2023
Page 2

Should you have any questions about this tariff filing, the notice to the Members, or the other documents referenced herein, you may contact me at 270-844-6140 or at senthia.santana@bigrivers.com.

Sincerely yours,

/s/ Senthia Santana

Senthia Santana
Associate Attorney

cc: Gregory H. Grissom
Tim Lindahl
Martin W. Littrel



(Name of Utility)

For All Territory Served By
 Cooperative's Transmission System
 P.S.C. KY. No. 27

Fourth Revised SHEET NO. 69

CANCELLING P.S.C. KY. No. 27

Third Revised SHEET NO. 69

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service

Applicability:

In all territory served by Big Rivers' transmission system.

Availability:

This schedule is available to any of Big Rivers' then existing Member Cooperatives for service to any large industrial customer of the Member Cooperative having generation equipment capable of supplying all or a portion of its power requirements for other than emergency purposes, who requests Backup Power Service, and who has or enters into a special contract that provides rates for electric service other than Backup Power Service (the "Standby Customer"). This schedule shall only apply to a Member Cooperative who has a standby service tariff under which it can pass through the charges under this schedule to a Standby Customer.

[T]
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Term:

This rate schedule shall take effect at 12:01 AM CPT on the effective date of this tariff.

Definitions:

Please see Section 4 for definitions common to all tariffs.

"Supplemental Power Service" – a service which provides transmission capacity to the Standby Customer as well as the energy and capacity requirements for use by the Standby Customer's facility in addition to the electric power which the Standby Customer ordinarily generates on its own.

DATE OF ISSUE September 1, 2023

DATE EFFECTIVE October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, 710 W. 2nd Street, Owensboro, KY 42301



(Name of Utility)

For All Territory Served By
 Cooperative's Transmission System
 P.S.C. KY. No. 27

Third Revised SHEET NO. 69.01

CANCELLING P.S.C. KY. No. 27

Second Revised SHEET NO. 69.01

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service – (continued)

Definitions (continued):

“Backup Power Service” – a service which provides transmission capacity as well as the energy and capacity requirements for use by the Standby Customer to replace energy generated by the Standby Customer’s own generation during an outage or other interruption of the Standby Customer’s own generation. [D]

“Self-Supply Capacity” – the electric capacity accredited by MISO for the Standby Customer’s generating unit(s). [T]
↓

Billing:

The provisions of the Standard Rate Schedule LIC – Large Industrial Customer tariff schedule and all applicable adjustment clauses and riders shall apply to Supplemental Power Service and Backup Power Service except where noted otherwise. [D]

Big Rivers shall bill each Member Cooperative in accordance with the billing and payment terms set forth in the Billing section of Big Rivers’ Standard Rate Schedule LIC – Large Industrial Customer tariff schedule, or the Standby Customer’s special contract with the Member Cooperative. Each month, each Member Cooperative shall be required to pay separately for each of its Standby Customers taking service under this schedule, in each case using that individual Standby Customer’s contract demand (if any) or metered demand, as applicable.

DATE OF ISSUE September 1, 2023

DATE EFFECTIVE October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
 President and Chief Executive Officer
 Big Rivers Electric Corporation, 310 W. 2nd Street, Owensboro, KY 42301



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

First Revised SHEET NO. 69.02

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.02

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service (continued)

A. Supplemental Power Service

Requirements

- 1. The level of demand required for Supplemental Power Service shall be the level of demand under the special contract between the Member Cooperative and the Standby Customer (if any) or metered demand, excluding any Backup Power demand. [T] ↓
- 2. All power not specifically identified as Backup Power shall be deemed to be Supplemental Power. [D] ↓
- 3. The total of the Supplemental Power and Backup Power demand shall not exceed Standby Customer's Maximum Contract Demand in any month. Backup Power demand shall not be included in determining minimum demand charges for any month. ↓

Billing

- 1. Supplemental Power energy shall be the actual measured energy excluding Backup Power energy sold to the Standby Customer in each month. [D]
- 2. Demand and Energy Charges: All Supplemental Power shall be billed under the terms and charges of Big Rivers' Standard Rate Schedule LIC – Large Industrial Customer tariff schedule.

DATE OF ISSUE September 1, 2023

DATE EFFECTIVE October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, 710 W. 2nd Street, Owensboro, KY 42301



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

First Revised SHEET NO. 69.03

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.03

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service (continued)

B. Backup Power Service

[D]

Requirements

- 1. The level of Backup Power demand shall equal the Standby Customer's Self-Supply Capacity as accredited by MISO. [T]
↓

[D]

Billing

- 1. Demand Charges: All Backup Power demand shall be billed at Big Rivers' Standard Rate Schedule LIC – Large Industrial Customer tariff rate, less a credit equal to the Self-Supply Capacity times the MISO Planning Resource Auction ("PRA") Auction Clearing Prices ("ACP") for the Big Rivers zone for the applicable resource auction time period. [T]
↓

[D]

↓

[T]

↓

DATE OF ISSUE September 1, 2023

DATE EFFECTIVE October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, 710 W. 2nd Street, Owensboro, KY 42301



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

First Revised SHEET NO. 69.04

CANCELLING P.S.C. KY.
No. _____

Original SHEET NO. 69.04

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service (continued)

Billing (continued)

- 2. Energy Charges: All Backup Power energy usage shall be billed at the higher of the charges of Big Rivers' Standard Rate Schedule LIC – Large Industrial Customer tariff schedule or the actual locational marginal price for energy by MISO at the applicable load node during each hour of the day at the time of delivery, plus any transmission charges, MISO fees, or other costs. [D] [T] ↓
- 3. During any period in which the metered output of the Standby Customer's generator is less than its Self-Supply Capacity, Backup Power energy shall be the first through the meter, up to the Self-Supply Capacity. Energy consumed above the Self-Supply Capacity for any period shall be Supplemental Power Energy. [D]

Terms and Conditions:

- 1. The Standby Customer shall be subject to all adders, riders, terms and conditions, and other provisions of any applicable schedule of the Member Cooperative's tariff under which the Standby Customer takes service; provided, however, in hours in which the energy charge for Backup Power energy is priced at the locational marginal price, those energy charges shall not be subject to the FAC, Non-FAC PPA, Environmental Surcharge, or MRSM riders. [N] ↓
- 2. Standby Customer shall be required to adhere to Big Rivers' requirements and procedures for interconnection.
- 3. The Standby Customer shall be required to allow Big Rivers to meter Standby Customer's generation, and to provide access for Big Rivers to install, operate and maintain the metering equipment, which shall remain the property of Big Rivers.
- 4. The Standby Customer shall be required to pay the cost of any new or additional facilities associated with providing service under the provisions of this schedule, and the Standby Customer shall be responsible for all costs (including any charges from ACES) related to the Standby Customer's generator. [N] ↓
- 5. The Standby Customer shall be responsible for any MISO charges, fees, penalties, or other costs associated with Standby Customer's generation, outages of Standby Customer's generation, or Backup Power service. [D]

DATE OF ISSUE September 1, 2023

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/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, 710 W. 2nd Street, Owensboro, KY 42301



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

First Revised SHEET NO. 69.05

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.05

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service (continued)

Terms and Conditions (continued):

- 6. The Standby Customer shall not transmit energy to Big Rivers or to the Member Cooperative.
- 7. The supplying of, and billing for, service and all conditions applying thereto, are subject to the jurisdiction of the Kentucky Public Service Commission, and to Big Rivers' and the Member Cooperative's generally applicable rules, terms, and conditions currently in effect, as filed with the Kentucky Public Service Commission.
- 8. Standby Customer shall provide reasonable protection for Big Rivers' and the Member Cooperative's systems.
- 9. Standby Customer shall design, construct, install, own, operate, and maintain its generation equipment in accordance with all applicable codes, laws, regulations, and generally accepted utility practices.
- 10. Standby Customer shall obtain insurance in the following minimum amounts for each occurrence:
 - a. Public Liability for Bodily Injury - \$1,000,000.00
 - b. Property Damage - \$500,000.00
- 11. Standby Customers with a non-dispatchable generation facility shall not be entitled to a capacity payment.
- 12. The Standby Customer is responsible for the cost of all facilities on the Standby Customer's site to meet and maintain eligibility as a MISO capacity resource, and the Standby Customer is subject to all non-performance costs levied by MISO or its successor, the Kentucky Public Service Commission, or other applicable entity related to nonperformance of its generating equipment.
- 13. Any and all costs incurred by Big Rivers as a result of the Standby Customer's generator's failure to generate, including, without limitation, ancillary services necessary to maintain reliability on the Big Rivers system and MISO RSG charges, may be charged to the Standby Customer in addition to all other charges.
- 14. The Standby Customer shall pay for all interconnection costs arising out of the Standby Customer's generator.
- 15. During system emergencies, Big Rivers may discontinue sales to the Standby Customer.

[D]

[N]

DATE OF ISSUE September 1, 2023

DATE EFFECTIVE October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, 710 W. 2nd Street, Owensboro, KY 42301

Big Rivers Electric Corporation Table of Contents

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DATE OF ISSUE	January 27, 2023 September 1, 2023
DATE EFFECTIVE	December 28, 2022 October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
 Big Rivers Electric Corporation, 710 W. 2nd Street, Owensboro, KY 42301



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Third~~Fourth
Revised SHEET NO. 69

CANCELLING P.S.C. KY. No. 27

~~Second~~Third
Revised SHEET NO. 69

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service

Applicability:

In all territory served by Big Rivers' transmission system.

Availability:

This schedule is available to any of Big Rivers' then existing Member Cooperatives for service to any large industrial customer of the Member Cooperative having generation equipment capable of supplying all or a portion of its power requirements for other than emergency purposes, who requests ~~supplemental, maintenance or backup power~~Backup Power Service, and who has or enters into a special contract that provides rates for electric service other than ~~supplemental, maintenance or backup power~~Backup Power Service (the "Standby Customer"). This schedule shall only apply to a Member Cooperative who has a standby service tariff under which it can pass through the charges under this schedule to a Standby Customer.

Term:

This rate schedule shall take effect at 12:01 AM CPT on the effective date of this tariff.

Definitions:

Please see Section 4 for definitions common to all tariffs.

DATE OF ISSUE ~~March 9, 2022~~
September 1, 2023
DATE EFFECTIVE ~~March 3, 2022~~
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~710 W. 2nd Street,
~~Henderson~~Owensboro, KY ~~42420~~42301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Third~~Fourth
Revised SHEET NO. 69

CANCELLING P.S.C. KY. No. 27

~~Second~~Third
Revised SHEET NO. 69

RATES, TERMS AND CONDITIONS – SECTION 2

“Supplemental Power Service” – a service which provides transmission capacity to the Standby Customer as well as the energy and capacity requirements for use by the Standby Customer’s facility in addition to the electric power which the Standby Customer ordinarily generates on its own.

DATE OF ISSUE March 9, 2022
September 1, 2023
DATE EFFECTIVE March 3, 2022
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~710 W. 2nd Street,
~~Henderson~~Owensboro, KY ~~42420~~42301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Second~~^{Third}
Revised SHEET NO. 69.01

CANCELLING P.S.C. KY. No. 27

~~First~~^{Second}
Revised SHEET NO. 69.01

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service – (continued)

Definitions (continued):

~~“Maintenance Power Service” – a service which provides transmission capacity as well as the energy and capacity requirements for use by the Standby Customer during scheduled outages or interruptions of the Standby Customer’s own generation.~~

“Backup Power Service” – a service which provides transmission capacity as well as the energy and capacity requirements for use by the Standby Customer to replace energy generated by the Standby Customer’s own generation during an ~~unscheduled~~ outage or other interruption of the Standby Customer’s own generation.

“Self-Supply Capacity” – the ~~demonstrated~~ electric capacity ~~of~~ accredited by MISO for the Standby Customer’s generating unit(s), ~~as determined by the reduction in Big Rivers’ MISO Planning Reserve Margin Requirement that results from the Standby Customer’s own generation.~~

Billing:

The provisions of the Standard Rate Schedule LIC – Large Industrial Customer tariff schedule and all applicable adjustment clauses and riders shall apply to Supplemental Power Service, ~~Maintenance Power Service~~ and Backup Power Service except where noted otherwise.

Big Rivers shall bill each Member Cooperative in accordance with the billing and payment terms set forth in the Billing section of Big Rivers’ Standard Rate Schedule LIC – Large Industrial Customer tariff schedule, or the Standby Customer’s special contract with the Member Cooperative. Each month, each Member Cooperative shall be required to pay separately for each of its Standby Customers taking

DATE OF ISSUE ~~March 9, 2022~~
September 1, 2023
DATE EFFECTIVE ~~March 3, 2022~~
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~ 310 W. 2nd
Street, ~~Henderson~~ Owensboro, KY ~~42420~~ 42301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Second~~Third
Revised SHEET NO. 69.01

CANCELLING P.S.C. KY. No. 27

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RATES, TERMS AND CONDITIONS – SECTION 2

service under this schedule, in each case using that individual Standby Customer's contract demand (if any) or metered demand, as applicable.

DATE OF ISSUE March 9, 2022
September 1, 2023
DATE EFFECTIVE March 3, 2022
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~310 W. 2nd
Street, ~~Henderson~~Owensboro, KY ~~42404~~2301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

First
~~Revised~~Original SHEET NO. 69.02

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.02

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service (continued)

A. Supplemental Power Service

Requirements

1. The level of demand required for Supplemental Power Service shall be the level of demand under the special contract between the Member Cooperative and the Standby Customer (if any) or metered demand, excluding any Backup Power demand.
2. All power not specifically identified as ~~Maintenance Power~~ or Backup Power shall be deemed to be Supplemental Power.
3. The total of the Supplemental Power, ~~Maintenance Power~~, and Backup Power demand shall not exceed Standby Customer's Maximum Contract Demand in any month. ~~Maintenance Power and~~ Backup Power demand shall not be included in determining minimum demand charges for any month.

Billing

1. Supplemental Power energy shall be the actual measured energy excluding ~~Maintenance Power energy and~~ Backup Power energy sold to the Standby Customer in each month.
2. Demand and Energy Charges: All Supplemental Power shall be billed under the terms and charges of Big Rivers' Standard Rate Schedule LIC – Large Industrial Customer tariff schedule.

DATE OF ISSUE March 9, 2022
September 1, 2023

DATE EFFECTIVE March 3, 2022
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~ 710 W. 2nd Street,
Henderson Owensboro, KY 424042301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

First
Revised Original SHEET NO. 69.03

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.03

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service (continued)

B. ~~Maintenance Power Service and~~ Backup Power Service

Requirements

- ~~1. The level of **Maintenance Power**/Backup Power demand shall equal the Standby Customer's Self-Supply Capacity as accredited by MISO.~~
- ~~2. The Standby Customer shall be required to cooperate with Big Rivers to schedule Maintenance outages so as to maximize the value of Standby Customer's Self-Supply Capacity. The Standby Customer's Maintenance Power requirements for each generating unit must be submitted to Big Rivers at least sixty (60) days prior to the beginning of each calendar year. Within thirty (30) days of such submission, Big Rivers shall respond to the Standby Customer either approving the Maintenance Power schedule or requesting that the Standby Customer reschedule those Maintenance Power requirements. The Standby Customer may adjust the Maintenance Power schedule upon prior notice to Big Rivers.~~
- ~~3.1. The Standby Customer shall notify Big Rivers by telephone within one (1) hour of the beginning and end of any outage. Within forty eight (48) hours of the end of an outage, the Standby Customer shall supply written notice to Big Rivers of the dates and times of the outage with verification that the outage had occurred.~~

Billing

- ~~1. Administrative Charge: The Administrative Charge shall be \$150 per month.~~
- ~~2.1. Demand Charges: All **Maintenance Power**/Backup Power demand shall be billed at Big Rivers' Standard Rate Schedule LIC – Large Industrial Customer tariff rate, less a credit equal to \$3.80 per kW month times Standby Customer's Self-Supply Capacitythe Self-Supply~~

DATE OF ISSUE March 9, 2022
September 1, 2023

DATE EFFECTIVE March 3, 2022
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~ 710 W. 2nd Street,
Henderson Owensboro, KY 4242042301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

First
Revised Original SHEET NO. 69.03

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.03

RATES, TERMS AND CONDITIONS – SECTION 2

Capacity times the MISO Planning Resource Auction ("PRA") Auction Clearing Prices ("ACP") for the Big Rivers zone for the applicable resource auction time period.

DATE OF ISSUE March 9, 2022
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October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~ 710 W. 2nd Street,
~~Henderson~~ Owensboro, KY 424042301

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(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Original~~^{First}
~~Revised~~ SHEET NO. 69.04

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.04

RATES, TERMS AND CONDITIONS – SECTION 2

LICSS – Large Industrial Customer Standby Service (continued)

Billing (*continued*)

- ~~3.2.~~ Energy Charges: All ~~Maintenance Power~~/Backup Power energy usage shall be billed at the higher of the charges of Big Rivers' Standard Rate Schedule LIC – Large Industrial Customer tariff schedule or the ~~market price, which shall include the energy charge Big Rivers would have had to pay to provide service to the Member Cooperative for the Standby Customer~~actual locational marginal price for energy by MISO at the applicable load node during each hour of the day at the time of delivery, plus any transmission charges, MISO fees, or other costs.
- 4.3. During any period in which the metered output of the Standby Customer's generator is less than its Self-Supply Capacity, ~~Maintenance Power~~/Backup Power energy shall be the first through the meter, up to the Self-Supply Capacity. Energy consumed above the Self-Supply Capacity for any period shall be Supplemental Power Energy.

Terms and Conditions:

- 1. The Standby Customer shall be subject to all adders, riders, terms and conditions, and other provisions of any applicable schedule of the Member Cooperative's tariff under which the Standby Customer takes service; provided, however, in hours in which the energy charge for Backup Power energy is priced at the locational marginal price, those energy charges shall not be subject to the FAC, Non-FAC PPA, Environmental Surcharge, or MRSM riders.
- 2. Standby Customer shall be required to adhere to Big Rivers' requirements and procedures for interconnection.
- 3. The Standby Customer shall be required to allow Big Rivers to meter Standby Customer's generation, and to provide access for Big Rivers to install, operate and maintain the metering equipment, which shall remain the property of Big Rivers.

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September 1, 2023

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October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~710 W. 2nd Street,
HendersonOwensboro, KY 4242042301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Original~~First
~~Revised~~ SHEET NO. 69.04

CANCELLING P.S.C. KY. No. _____

Original SHEET NO. 69.04

RATES, TERMS AND CONDITIONS – SECTION 2

- The Standby Customer shall be required to pay the cost of any new or additional facilities associated with providing service under the provisions of this schedule, and the Standby Customer shall be responsible for all costs (including any charges from ACES) related to the Standby Customer's generator.
- The Standby Customer shall be responsible for any MISO charges, fees, penalties, or other costs associated with Standby Customer's generation, outages of Standby Customer's generation, or ~~Maintenance or~~ Backup Power service.

DATE OF ISSUE March 9, 2022
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October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~ 710 W. 2nd Street,
~~Henderson~~ Owensboro, KY ~~42420~~ 42301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



(Name of Utility)

For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Original~~ First Revised SHEET NO. 69.05

CANCELLING P.S.C. KY. No. 27

Original SHEET NO. 69.05

RATES, TERMS AND CONDITIONS – SECTION 42

LICSS – Large Industrial Customer Standby Service (continued)

Terms and Conditions (continued):

- 6. The Standby Customer shall not transmit energy to Big Rivers or to the Member Cooperative.
- ~~7. The Member Cooperative may enter into special agreements with Big Rivers and Standby Customers which may deviate from the provisions of this schedule. Such agreements shall address those significant characteristics of service and cost which would influence the need for such an agreement.~~
- ~~8.~~ 7. The supplying of, and billing for, service and all conditions applying thereto, are subject to the jurisdiction of the Kentucky Public Service Commission, and to Big Rivers' and the Member Cooperative's generally applicable rules, terms, and conditions currently in effect, as filed with the Kentucky Public Service Commission.
- 8. Standby Customer shall provide reasonable protection for Big Rivers' and the Member Cooperative's systems.
- 9. Standby Customer shall design, construct, install, own, operate, and maintain its generation equipment in accordance with all applicable codes, laws, regulations, and generally accepted utility practices.
- 10. Standby Customer shall obtain insurance in the following minimum amounts for each occurrence:
 - a. Public Liability for Bodily Injury - \$1,000,000.00
 - b. Property Damage - \$500,000.00
- 11. Standby Customers with a non-dispatchable generation facility shall not be entitled to a capacity payment.

DATE OF ISSUE March 9, 2022
September 1, 2023

DATE EFFECTIVE March 3, 2022
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~ 710 W. 2nd Street,
~~Henderson~~ Owensboro, KY 4242042301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*



For All Territory Served By
Cooperative's Transmission System
P.S.C. KY. No. 27

~~Original~~
Revised SHEET NO. 69.05



CANCELLING P.S.C. KY. No. 27

(Name of Utility)

Original SHEET NO. 69.05

RATES, TERMS AND CONDITIONS – SECTION 42

- 12. The Standby Customer is responsible for the cost of all facilities on the Standby Customer's site to meet and maintain eligibility as a MISO capacity resource, and the Standby Customer is subject to all non-performance costs levied by MISO or its successor, the Kentucky Public Service Commission, or other applicable entity related to nonperformance of its generating equipment.
- 13. Any and all costs incurred by Big Rivers as a result of the Standby Customer's generator's failure to generate, including, without limitation, ancillary services necessary to maintain reliability on the Big Rivers system and MISO RSG charges, may be charged to the Standby Customer in addition to all other charges.
- 14. The Standby Customer shall pay for all interconnection costs arising out of the Standby Customer's generator.
- 15. During system emergencies, Big Rivers may discontinue sales to the Standby Customer.

DATE OF ISSUE March 9, 2022
September 1, 2023

DATE EFFECTIVE March 3, 2022
October 1, 2023

/s/ Robert W. Berry

ISSUED BY: Robert W. Berry,
President and Chief Executive Officer
Big Rivers Electric Corporation, ~~201 Third~~ 710 W. 2nd Street,
~~Henderson~~ Owensboro, KY 4242042301

*Issued by Authority of an Order of the Commission,
dated March 3, 2022, in Case No. 2021-00289*

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

5 **IN THE MATTER OF:**

LARGE INDUSTRIAL CUSTOMER)	TFS No.
STANDBY SERVICE TARIFF FILING OF)	2023-00_____
BIG RIVERS ELECTRIC CORPORATION)	

6
7

DIRECT TESTIMONY OF NATHANIAL A. BERRY

8

I. INTRODUCTION

9 **Q. State your name, occupation and business address.**

10 A. My name is Nathaniel A. (Nathan) Berry. I am the Chief Operating
11 Officer of Big Rivers Electric Corporation ("*Big Rivers*"). My business
12 address is 710 W. Second Street, Owensboro, Kentucky 42301.

13 **Q. Briefly describe your education and work experience.**

14 A. I graduated from the Rochester Institute of Technology in 2008, with a
15 Bachelor of Science Degree in Mechanical Engineering. In 2022, I
16 graduated from the University of Louisville with a Master's Degree in
17 Business Administration. I worked at Louisville Gas & Electric from 2007
18 to 2008, Duke Energy from 2008-2013, and Alabama Power Company from
19 2013-2017. I began my career with Big Rivers in 2017 and have served in
20 a variety of production managerial roles including Production Manager,
21 Plant Manager, and Vice President of Production. Currently, I serve as the

1 Chief Operating Officer for Big Rivers. My professional experience is
2 summarized in Exhibit Berry-1.

3 **Q. Please summarize your duties at Big Rivers.**

4 A. As the Chief Operating Officer for Big Rivers, I oversee all activities
5 related to the operation and maintenance of the corporation's coal and
6 gas-fired generating facilities, including engineering and construction,
7 fuel procurement and management, energy dispatch, IT management, and
8 transmission. In addition to these responsibilities, I oversee Big Rivers'
9 energy marketing and economic development efforts.

10 **Q. Have you previously testified before the Kentucky Public Service
11 Commission (“Commission”)?**

12 A. Yes. I provided written and oral testimony before the Commission on
13 behalf of Big Rivers in Case No. 2020-00299,¹ in which Big Rivers
14 presented its 2020 Integrated Resource Plan. I also provided written
15 testimony in Case Nos. 2022-00028² and 2023-00038,³ in which Big Rivers
16 filed its annual MRSM applications.

17

¹ *In the Matter of: Electronic 2020 Integrated Resource Plan of Big Rivers Electric Corporation, Case No. 2020-00299.*

² *In the Matter of: Electronic Application of Big Rivers Electric Corporation for Annual Review of Its MRSM Charge for Calendar Year 2021, Case No. 2022-00028.*

³ *In the Matter of: Electronic Application of Big Rivers Electric Corporation for Annual Review of Its MRSM Charge for Calendar Year 2022, Case No. 2023-00038.*

1 **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to support proposed revisions to Big
3 Rivers' Large Industrial Customer ("*LIC*") Standby Service rate schedule
4 that Big Rivers is filing with this testimony pursuant to the Commission's
5 March 3, 2022, Order in Case No. 2021-00289 ("*Mar. 3, 2022 Order*").⁴

6 **II. STANDBY SERVICE SCHEDULE**

7 **Q. Please describe the Standby Service rate schedule.**

8 A. The Standby Service rate schedule is available to any Big Rivers' existing
9 Member Cooperatives for service to any large industrial customer of the
10 Member Cooperative with resources capable of supplying all or a portion
11 of the customer's power requirements who requests Standby Power
12 Service. ("*Standby Customer*").

13 **Q. What is Standby Power Service?**

14 A. Under the proposed changes to the Standby Service tariff, Standby Power
15 Service includes both Supplemental Power Service and Backup Power
16 Service. Supplemental Power Service refers to transmission service and
17 power supply to the Standby Customer's facility for its needs that exceed
18 the capability of the Standby Customer's own generation. Backup Power
19 Service refers to transmission service and power supply to the Standby

⁴ *In the Matter of: Electronic Tariff Filing of Big Rivers Electric Corporation and Kenergy Corp. to Implement a New Standby Service Tariff*, Case No. 2021-00289.

1 Customer during outages or other interruptions of the Standby
2 Customer's own generation.

3 **Q. Please describe the rates for demand and energy in the Standby**
4 **Service rate schedule.**

5 A. The demand rate in the Standby Service tariff requires that the Member
6 Cooperative pay the standard LIC demand charge for service for both
7 Supplemental Power demand and Backup Power demand, less a credit for
8 the value of the Standby Customer's self-supply capacity. Energy charges
9 for Supplemental Power Service are the standard LIC energy rates. The
10 rate for Backup Power energy is the higher of the LIC energy charge, or
11 the locational marginal price for energy at the applicable MISO load node,
12 plus any transmission charges, MISO fees, or other costs.

13 Big Rivers is not proposing changes to this basic structure;
14 however, Big Rivers is proposing a change to how the capacity credit is
15 determined, to remove any distinction between Maintenance Power
16 Service and Backup Power Service, and to make clarifying refinements to
17 the tariff language.

18 **Q. What is the basis for the proposed capacity credit for self-supply?**

19 A. The proposed credit is equal to the Self Supply Capacity (the electric
20 capacity accredited by MISO for the Standby Customer's generating
21 unit(s)) multiplied by the MISO Planning Resource Auction ("PRA")

1 Auction Clearing Prices (“ACP”) for the Big Rivers zone for the applicable
2 resource auction period.

3 **Q. Explain why Big Rivers’ does not propose to continue using \$3.80**
4 **per kW per month as the capacity credit.**

5 A. The \$3.80 per kW per month credit was based on the cost to convert Big
6 Rivers’ Green generation station from coal-fired to natural-gas fired. In
7 the Mar. 3, 2020 Order, the Commission approved that credit but found
8 that the Green Station conversion costs were “a historical cost and may
9 not be the most appropriate value moving forward”⁵

10 Big Rivers proposes that the credit be based on the applicable PRA
11 price times the accredited capacity of the Standby Customer’s generator.
12 Regardless of Big Rivers’ capacity position, Big Rivers must purchase all
13 of the capacity needed for its Member load at the PRA price. Therefore,
14 the benefit to Big Rivers from a Standby Customer’s generator is the
15 savings Big Rivers receives by purchasing less capacity in MISO equal to
16 the accredited capacity of the customer’s generator. The demand charge
17 for Backup Power Service ensures that the Standby Customer pays its
18 share of Big Rivers’ fixed costs associated with having the ability to
19 supply the customer’s full load when the customer’s generator is down,

⁵ Mar. 3, 2022 Order at p. 21.

1 while flowing the benefit of the Standby Customer’s generator back to the
2 customer through the demand credit.

3 **Q. Please explain why Backup Power Service incorporates both**
4 **Maintenance Power Service and Backup Power Service as**
5 **defined in Big Rivers’ existing Standby Service tariff.**

6 A. Big Rivers recognizes that the Commission’s Mar. 3, 2022 Order stated
7 that Maintenance Power Service and Backup Power Service, as those
8 terms are used in the current Standby Service tariff, are different,⁶ and
9 that bundling the pricing of the two service was inappropriate.⁷ However,
10 Big Rivers respectfully disagrees that the difference between the two
11 services results in a difference in cost. The Commission found in the Mar.
12 3, 2022 Order that

13 up until Kimberly-Clark began self-supplying a portion of its
14 demand, it had been paying LIC Tariffed demand charges on
15 its entire demand. It is not fair to the other customer for it
16 to stop paying for that capacity even though it will be utilized
17 on a temporary and incremental basis.”⁸

18 The proposed Backup Power demand rate ensures that Standby
19 Customers pay the LIC demand charges on their entire demand when
20 their generator is on outage (less the demand credit). When a Standby
21 Customer requests Backup Power Service, the Standby Customer is

⁶ *Id.* at p. 17.

⁷ *Id.* at p. 20.

⁸ *Id.* at p. 19, n. 92.

1 purchasing a service whereby Big Rivers must make available the
2 transmission service and power needed by the Standby Customer when
3 the customer’s generator is on outage or is not otherwise operating at its
4 full accredited capacity. Because Big Rivers must have that capability
5 available at all times in the event of an unscheduled outage, it does not
6 change Big Rivers’ cost if the customer also schedules some of its outages.
7 And so long as the customer is paying for that capability, it should not be
8 charged any different amounts for scheduled outages.

9 In the Mar. 3, 2022 Order, the Commission noted, “In the event of
10 an unplanned outage, regardless of when it occurs, Kimberly-Clark
11 reverts to its historic demand level, and BREC is obligated to provide
12 service at Kimberly-Clark’s prior full demand level.”⁹ This is also true of
13 planned outages. In the event of a planned outage, Big Rivers is likewise
14 obligated to provide service at a Standby Customer’s full demand level.
15 Thus, there are not separate costs to Big Rivers for Maintenance Power
16 Service and Backup Power Service, as those terms are used in the existing
17 Standby Service tariff. For that reason, the proposed tariff changes
18 remove Maintenance Power Service and define Backup Power Service to
19 apply in both scheduled and unscheduled outages.

⁹ Mar. 3, 2022 Order at p. 18.

1 **Q. Has MISO’s move towards a seasonal construct provided Big**
2 **Rivers the option to carry shorter-term capacity requirements to**
3 **supply a standby customer’s maintenance requirements, rather**
4 **than on an annual basis, as suggested by the Commission?**¹⁰

5 A. No. While the PRA price changes seasonally under MISO’s seasonal
6 construct, the seasonal construct does not change Big Rivers’ obligation to
7 be able to supply a Standby Customer’s full demand level at a moment’s
8 notice. The rate for Backup Power Service is unrelated to Big Rivers’
9 capacity position in MISO. Instead, the rate is designed to ensure that
10 the Standby Customer pays its share of the Big Rivers system fixed costs
11 in proportion to the capacity that it requires be provided in the event of an
12 outage of its generator.

13 **Q. Do the proposed changes to the Standby Service tariff address the**
14 **Commission’s finding that “the Backup Power Service and**
15 **Maintenance Power Service Rates presumes only a current**
16 **customer, rather than a new one, will attempt to take service**
17 **under this tariff offering and that transmission capacity is**
18 **fixed.”**¹¹

19 A. The Standby Service tariff applies to both customers who are new to the
20 Big Rivers system as well as existing LIC customers that add self-

¹⁰ See Mar. 3, 2022 Order at p. 22.

¹¹ Order at 23.

1 generation. The Standby Service tariff requires Standby Customers
2 (whether new or existing) to have or to enter into a special contract. The
3 special contract can dictate the demand for Supplemental Power Service.
4 If not, the Standby Service tariff provides that Supplemental Power
5 demand will be the metered demand for a month.

6 Whether a new or existing customer, the level of Backup Power
7 demand is equal to the Standby Customer's Self-Supply Capacity because
8 that Self-Supply Capacity is what Big Rivers must have the transmission
9 service and power available at all times to supply to the customer in the
10 event of an outage of the customer's generator.

11 The proposed changes to the Standby Service tariff do clarify that a
12 new or existing customer connecting its generator to the Big Rivers
13 transmission system is responsible for the interconnection costs and any
14 potential facilities upgrade cost.

15 **Q. Do the proposed changes to the Standby Service tariff include**
16 **revisions clarifying which adjustment clauses and riders apply to**
17 **energy charges?**

18 A. Yes. On proposed Sheet No. 69.04, the Standby Service tariff states, "[I]n
19 hours in which the energy charge for Backup Power energy is priced at
20 the locational marginal prices, those energy charges shall not be subject to
21 the FAC, Non-FAC PPA, Environmental Surcharge, or MRSM riders."

1 This clarification is consistent with the Joint Agreement approved by the
2 Commission in Case No. 2023-00063.¹²

3 **Q. Does the tariff address the Commission’s concern of Standby
4 Customers extending outages?**

5 A. No. In its Mar. 3, 2022 Order, the Commission noted, “Furthermore,
6 there is no provision in the tariff to address the potential of standby
7 customers extending outages, which would effectively provide standby
8 customers a means to avoid relatively higher fuel prices for its own
9 generation.”¹³ Big Rivers has not proposed any changes to specifically
10 address this concern. However, the Standby Service ensures that Big
11 Rivers’ recovers the cost of providing Backup Power Service from Standby
12 Customers, and therefore insulates Big Rivers from customer’s extending
13 outages based on their own fuel prices.

14 **Q. Why is Big Rivers proposing to remove the administrative
15 charge?**

16 A. In lieu of an administrative charge, Big Rivers is proposing to pass
17 through to the Standby Customer the actual costs associated with the
18 Standby Customer’s self-generation, such as the actual costs of services
19 from ACES Power Marketing.

¹² *In the Matter of: Kimberly-Clark Corporation v. Big Rivers Electric Corporation and Kenergy Corp.*, Case No. 2023-00063, Order (June 30, 2023).

¹³ Mar 3. 2022 Order at p. 20.

1 **Q. What other changes is Big Rivers proposing to the Standby**
2 **Service tariff?**

3 A. Big Rivers is proposing several changes consistent with Big Rivers'
4 proposed QF tariff, including limiting capacity credits to customer-
5 generators that are dispatchable, and other changes that are designed to
6 protect other customers from costs or damages caused by the Standby
7 Customer interconnecting its generator with the Big Rivers transmission
8 system. This includes requirements that the customer comply with
9 applicable codes and regulations and generally accepted utility practices,
10 that the customer have insurance for damages to persons and property,
11 that customers pay for interconnection costs and for any penalties
12 resulting from a failure of the customer's generator to perform, etc.

13 **Q. Are the rates, terms, and conditions of the Standby Service rate**
14 **schedule fair, just, and reasonable?**

15 A. Yes.

16 **III. CONCLUSION**

17 **Q. Please summarize your conclusion and recommendation.**

18 A. The proposed changes to the Standby Service rate schedule are fair, just,
19 and reasonable. As such, the Commission should accept the proposed
20 changes to the Standby Service rate schedule as filed.

21

1

2 **Q. Does this conclude your testimony?**

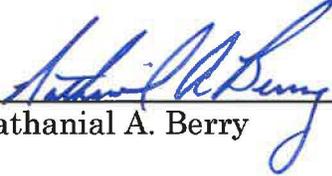
3 **A. Yes.**

BIG RIVERS ELECTRIC CORPORATION

**LARGE INDUSTRIAL CUSTOMER
STANDBY SERVICE TARIFF FILING
OF BIG RIVERS ELECTRIC CORPORATION
TFS No. 2023-00_____**

VERIFICATION

I, Nathaniel A. Berry, verify, state, and affirm that I prepared or supervised the preparation of the Direct Testimony filed with this Verification, and that Direct Testimony is true and accurate to the best of my knowledge, information, and belief after a reasonable inquiry.



Nathaniel A. Berry

COMMONWEALTH OF KENTUCKY)
COUNTY OF DAVIESS)

SUBSCRIBED AND SWORN TO before me by Nathaniel A. Berry on this the
30 day of August 2023.



Notary Public, Kentucky State at Large
Kentucky ID Number KYNP43026
My Commission Expires 01-14-2026

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

AFFIDAVIT OF SENTHIA SANTANA

COMMONWEALTH OF KENTUCKY)
COUNTY OF DAVIESS)

Comes the affiant, Senthia Santana, and after being duly sworn, states as follows:

1. I am employed by Big Rivers Electric Corporation ("Big Rivers") as in house counsel. I am an authorized representative of Big Rivers for purposes of this affidavit.
2. On September 1, 2023, Big Rivers electronically filed new tariff sheets to implement a new Large Industrial Customer Standby Service tariff schedule.
3. Pursuant to 807 KAR 5:011 Section 8(3)(a), I verify that on September 1, 2023, Big Rivers mailed the notice letter being filed with this affidavit as required by 807 KAR 5:011 Section 8 to its only three customers (its three member distribution cooperatives).



Senthia Santana

SUBSCRIBED AND SWORN TO before me by Senthia Santana on this the 1
day September, 2023.



Notary Public, Kentucky State at Large

My Commission Expires:

01-14-26

Notary ID:

KYNP43026



Big Rivers Electric Corporation
710 West 2nd Street
Owensboro, KY 42301
www.bigrivers.com

September 1, 2023

Mr. Greg Grissom
President and CEO
Jackson Purchase Energy Corp.
2900 Irvin Cobb Drive
P.O. Box 4030
Paducah, KY 42002

Mr. Tim Lindahl
President and CEO
Kenergy Corp.
6402 Old Corydon Road
P.O. Box 18
Henderson, KY 42419-0018

Mr. Marty Littrel
President and CEO
Meade County Rural Electric Cooperative Corporation
1351 Hwy. 79
Brandenburg, KY 40108

RE: *NOTICE BY BIG RIVERS ELECTRIC CORPORATION OF FILING OF REVISED TARIFF*

Gentlemen:

Big Rivers Electric Corporation (“*Big Rivers*”) today made a tariff filing to the Kentucky Public Service Commission (“*Commission*”), filing a revised Large Industrial Customer Standby Service or LICSS tariff. Big Rivers is providing this notice pursuant to 807 KAR 5:011 Section 8. The issue date of the tariff is the date the tariff was filed, September 1, 2023, and the tariff has a proposed effective date of October 1, 2023.

The only Big Rivers customer class to which the LICSS tariff applies is Big Rivers’ Large Industrial class, and it only applies to your retail service to a Large Industrial Customer who self-generates power; who requests standby power service; and who has or enters into a special contract that does not provide rates for standby power service (a “*Standby Customer*”). The LICSS also only applies if you chose to adopt a standby service tariff under which you pass through the charges under the LICSS tariff to a Standby Customer.

Mr. Greg Grissom
Mr. Tim Lindahl
Mr. Marty Littrel
September 1, 2023
Page 2 of 3

The present rates under the existing Big Rivers LICSS tariff for supplemental, maintenance, or backup power are as follows. The rates include a \$150/month Administrative Charge. The existing rates for supplemental power are the same as Big Rivers' Standard Rate LIC tariff schedule. The existing demand charges for maintenance and backup power is the demand rate under Big Rivers' Standard Rate LIC tariff schedule, less a credit equal to \$3.80/kw-month times the retail customer's Self-Supply Capacity. The current energy charges for maintenance and backup power are the higher of the energy charges under Big Rivers' Standard LIC tariff schedule, or the market price, including any energy charges, transmission charges, MISO fees, and other costs.

The demand rate in the proposed tariff requires that the Member Cooperative pay the standard LIC demand charge for service for both Supplemental Power demand and Backup Power demand, less a credit for the value of the Standby Customer's Self Supply Capacity. Energy charges for Supplemental Power Service are the standard LIC energy rate. The rate for Backup Power energy is the higher of the LIC energy charge, or the locational marginal price for energy at the applicable MISO load node, plus any transmission charges, MISO fees, or other costs. Big Rivers is not proposing changes to the basic structure, however, Big Rivers is proposing a change to how the capacity credit is determined, to remove any distinction between Maintenance Power Service and Backup Power Service, and to make clarifying refinements to the tariff language.

Pursuant to 807KAR 5:011 Section 8(4)(d), Big Rivers is required to provide the average usage and the effect upon the average bill for each customer classification to which the revised LICSS tariff will apply. The average usage, from July 2022 through July 2023, of the only retail member currently billed under the LICSS tariff is 13,151,932.75 KWH per month. Big Rivers is unable to provide the effect upon the average bill for each customer classification to which the LICSS tariff will apply, because the rates in the tariff rely upon (a) MISO LMP, which are updated in real-time every five minutes and (b) MISO PRA ACP, which varies by quarter, on a forecast basis, and for which MISO does not yet have a full year of implementation. These facts render it impossible to provide a meaningful projection of the effect upon average bills for the customer classifications to which the tariff applies.

A person may examine this tariff filing at Big Rivers' offices located at 710 W. Second Street, Owensboro, Kentucky 42301. A person may also examine this tariff filing at the Commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m. (Eastern) or through the Commission's website at <http://psc.ky.gov>.

Comments regarding this tariff filing may be submitted to the Public Service Commission through its website or by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602.

The rates contained in the revised tariff are the rates proposed by Big Rivers, but the Public Service Commission may order rates to be charged that differ from Big Rivers' proposed tariff.

Mr. Greg Grissom
Mr. Tim Lindahl
Mr. Marty Littrel
September 1, 2023
Page 3 of 3

A person may submit a timely written request for intervention to the Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the status and interest of the party. If the Commission does not receive a written request for intervention within thirty (30) days of the initial mailing of this notice, the Commission may take final action on the tariff filing.

Sincerely yours,

/s/ Senthia Santana

Senthia Santana
Associate Attorney
senthia.santana@bigrivers.com
Phone: (270)844-6140