

From: [REDACTED]
To: [PSC Public Comment](#)
Subject: Submitting public comments to Dockets 2023-00159 and 2023-00092
Date: Monday, November 13, 2023 10:36:07 AM
Attachments: [2023-00092 KY Power IRP Vote Solar Public Comment.pdf](#)
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Hello,

I would like to submit comments to the KY Power IRP docket no. 2023-00092 and KY Power Rate Case docket no [REDACTED]. Please see the attached documents.

Thank you,
Jake Duncan



November 13, 2023

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

Subject: Support for the Recommendations of Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society in Kentucky Power's 2022 Integrated Resource Plan Case No. 2023-00092.

Dear Commissioners,

I am writing on behalf of Vote Solar to express our strong support for the recommendations of Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society (Joint Intervenors) in the matter of Kentucky Power Company's Integrated Resource Plan (IRP) in Case No. 2023-00092.

Founded in 2001, Vote Solar's mission is to realize a 100% clean energy future through a solutions-driven, people-first approach. A 501(c)3 nonprofit with more than 94,000 members nationwide, including members in Kentucky, Vote Solar advances just and equitable clean energy policy at the state level. Vote Solar is active in over 20 states, and has engaged in numerous public utility commissions on the topics of rate design, resource planning, and program design to lower energy costs for ratepayers, reduce harmful pollution, and build a brighter, cleaner, more equitable future.

The testimony provided by the Joint Intervenors raises important points about both Kentucky Power's IRP and the IRP process undertaken by the PSC. Vote Solar supports the Joint Intervenors recommendations in regards to:

1. Stakeholder Engagement:

The stakeholder meetings conducted by Kentucky Power during the IRP development are a step in the right direction. However, to ensure a more transparent and robust planning process, it's imperative to adopt best practices from other states. This includes setting clear timeframes for feedback, sharing data and modeling insights, and providing illustrative examples from other jurisdictions.

IRPs are an extraordinarily complicated product that require a broad array of perspectives and expertise to collaborate over time. Enacting a process that allows stakeholders and Kentucky Power to work together can create a more robust, creative, and visionary IRP than would have occurred if the process occurred within only one entity.

2. Transition to Renewable Energy:



The current IRP is pivotal for Kentucky Power's shift from its long standing reliance on the Rockport UPA and the Mitchell coal plant. While the retirement of major coal plants is certainly a challenge from an engineering perspective, solutions exist. For example, Xcel Minnesota has recently announced that the closure of two major plants will be replaced with solar, wind, and batteries at the plant site to use existing transmission infrastructure. While the inclusion of renewable energy sources in Kentucky Power's plan is commendable, there's a pressing need to ensure that the plan doesn't just meet, but exceeds, its objectives of customer affordability, rate stability, reliability, and local impact and sustainability.

3. Demand-Side Management and Energy Efficiency:

The potential of demand-side resources remains largely untapped. I echo the Joint Intervenors' recommendation for Kentucky Power to propose expanded DSM/EE program offerings in 2024. The introduction of an inclusive utility investment program, especially one that incorporates the Pay As You Save (PAYS®) program standards, can be a game-changer. Such a program would not only reduce overall system costs but also significantly lower customer bills, addressing the high energy burdens faced by many in the state.

4. Promotion of Distributed Energy Resources (DERs):

The future of energy is decentralized. DERs offer a sustainable and efficient way to meet our energy needs. Kentucky Power should be proactive in incorporating an evaluation of DERs, forecasting their potential, and considering higher levels of DER adoption.

In conclusion, I urge the Public Service Commission to give due consideration to the concerns and recommendations presented by the Joint Intervenors. Their insights, backed by expert reports and a deep understanding of the energy landscape, can guide Kentucky towards a more sustainable, affordable, and efficient energy future.

Thank you for your attention to this matter. I trust that the Commission will make decisions that are in the best interest of all Kentuckians.

Sincerely,

Jake Duncan
Southeast Regulatory Director
Vote Solar

