

Public Comments Received for Case Number: 2025-00113  
Response Monday, November 10, 2025

Thank you for your comments. Your comments in the above referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2025-00113 in any further correspondence.

The documents in this case are available at: [View Case Filings for: 2025-00113 \(ky.gov\)](#).

Thank you for your comments. Your comments in the above referenced matter have been received

---

Received through Public Comments Friday, November 7, 2025

From: JL Rogers Family LLC, Michael Garavaglia, Manager  
City: Greenville  
State: KY  
Zip: 42345

Comments:

Public Comment to the Kentucky Public Service Commission

Re: Proposed Tariff Rate Changes – KU Case 2025-00113 and LGE Case 2025-00114

To the Honorable Members of the Kentucky Public Service Commission:

With appreciation for your service to the Commonwealth, I submit this comment as a landowner and business operator in Muhlenberg County, Kentucky, to express concern about the tariff changes proposed in the above-referenced cases.

Our region has faced lasting economic hardship following the decline of coal mining and coal-related energy production. We are now working, in cooperation and partnership with Muhlenberg Economic Growth Alliance (MEGA), the Economic Development arm for Muhlenberg County, Kentucky to build a new foundation for growth—attracting industry, creating jobs, and developing housing to support a stronger local economy. To achieve this, reliable and competitively priced electricity is essential.

In partnership with a solar energy developer, we are pursuing local generation that can provide new power supply to support industrial development in this area. Prospects for further development have questioned the availability of local base load power, and repeatedly asked if renewable energy could be made available, both representing conditions of moving forward. However, the tariff as currently proposed would undermine these efforts by reducing the rate paid for solar energy in the Qualifying Facility tariffs by approximately 14%, while increasing payments for other generation sources by 37%. This imbalance would make solar development in Kentucky economically unviable and remove an important tool for rural revitalization, and leave “other” sources of generation as the only alternative.

The LGE/KU Integrated Resource Plan calls for expanded solar generation as part of a diversified and resilient energy mix. Yet this proposed tariff directly conflicts with that objective, discouraging the very investment that Kentucky's own energy plan envisions. Solar power has been proven—nationwide and globally—to reduce the cost of delivered electricity and provide long-term price stability, insulating ratepayers from the volatility of fossil fuel markets.

Manufacturing is Kentucky's largest economic sector, generating \$48.97 billion in GDP in 2024. To remain competitive, manufacturers must meet increasingly stringent sustainability and renewable energy benchmarks. When Kentucky utilities fail to provide sufficient renewable

energy options, these companies are forced to look elsewhere—taking jobs, investment, and tax revenue with them.

The proposed tariff places our local project, and the communities counting on it, at risk, specifically:

– Paradise Solar Project, Muhlenberg County

- 80 MW project on a reclaimed coalfield
- \$140 million in private investment that will attract additional private industrial investment on lands nearby

If adopted as proposed, this tariff would likely cancel or delay this project and others like it—foregoing hundreds of construction jobs, millions in local tax revenue, and opportunities to convert former reclaimed coal land into productive energy sites.

Solar energy represents the lowest levelized cost of new electricity generation and offers a forward-stable price. A fair and balanced tariff that values solar energy on par with other sources would:

- Encourage in-state investment and job creation;
- Strengthen Kentucky's energy independence and sovereignty;
- Support long-term affordability for all ratepayers; and
- Align with the Integrated Resource Plan's stated objectives.

I respectfully urge the Commission to reconsider the tariff as proposed and adopt a structure that provides parity for solar generation within the LGE and KU service territories. This is an opportunity to position Kentucky for sustainable growth, energy stability, and renewed industrial competitiveness.

Kentucky can and should lead in building an energy future that benefits its people, its businesses, and its communities.

Respectfully submitted,

JL Rogers Family LLC  
Landowner and Business Operator  
Michael Garavaglia, Jr., Manager  
116 W Main Cross St  
Muhlenberg County, Kentucky  
Date: 11/7/2025

\*Angela M Goad  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Honorable W. Duncan Crosby III  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KY 40202-2828

\*Joe F. Childers  
Childers & Baxter PLLC  
300 Lexington Building, 201 West Sho  
Lexington, KY 40507

\*Ashley Wilmes  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KY 40602

\*Thomas J FitzGerald  
Counsel & Director  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KY 40602

\*John Horne  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Honorable Allyson K Sturgeon  
Vice President and Deputy General Counsel-  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KY 40202

\*Gabriel Thatcher  
Attorney Senior  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KY 40507

\*Honorable Kurt J Boehm  
Attorney at Law  
Boehm, Kurtz & Lowry  
425 Walnut Street  
Suite 2400  
Cincinnati, OH 45202

\*Byron Gary  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KY 40602

\*Hannah Wigger  
Sheppard Mullin Richter & Hampton LLP  
2099 Pennsylvania Avenue NW, Suite 1  
Washington, DC 20006

\*Kyle J Smith  
General Attorney  
U.S. Army Legal Services Agency  
9275 Gunston Road  
ATTN: JALS-RL/IP  
Fort Belvoir, VA 22060-554

\*Carrie H Grundmann  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103

\*James B Dupree  
50 Third Ave  
Building 1310- Pike Hall  
Fort Knox, KY 40121

\*Honorable Lindsey W Ingram, III  
Attorney at Law  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KY 40507-1801

\*Honorable David J. Barberie  
Managing Attorney  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KY 40507

\*James W Gardner  
Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street  
Suite 1400  
Lexington, KY 40507

\*Lawrence W Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Honorable David Edward Spenard  
Strobo Barkley PLLC  
239 South 5th Street  
Ste 917  
Louisville, KY 40202

\*Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
425 Walnut Street  
Suite 2400  
Cincinnati, OH 45202

\*Matt Partymiller  
President  
Kentucky Solar Industries Association  
1038 Brentwood Court  
Suite B  
Lexington, KY 40511

\*J. Michael West  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Randal A. Strobo  
Strobo Barkley PLLC  
239 South 5th Street  
Ste 917  
Louisville, KY 40202

\*Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
425 Walnut Street  
Suite 2400  
Cincinnati, OH 45202

\*Steven W Lee  
Spilman Thomas & Battle, PLLC  
1100 Brent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050

\*Nathaniel Shoaff  
Sierra Club  
2101  
Webster St. , Suite 1300  
Oakland, CA 94612

\*Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Paul Werner  
Sheppard Mullin Richter & Hampton LLP  
2099 Pennsylvania Avenue NW, Suite 1  
Washington, DC 20006

\*Sara Judd  
Senior Corporate Attorney  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KY 40202

\*Rick E Lovekamp  
Manager - Regulatory Affairs  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KY 40202

\*Toland Lacy  
Office of the Attorney General  
700 Capital Avenue  
Frankfort, KY 40601

\*Robert Conroy  
Vice President, State Regulation and Rates  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KY 40202

\*M. Todd Osterloh  
Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street  
Suite 1400  
Lexington, KY 40507

\*Rebecca C. Price  
Sturgill, Turner, Barker & Moloney  
155 East Main Street  
Lexington, KY 40507