

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ADJUSTMENT) CASE NO. 2018-00294
ADJUSTMENT OF ITS ELECTRIC RATES)**

and

In the Matter of:

**ELECTRONIC APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY FOR AN) CASE NO. 2018-00295
ADJUSTMENT OF ITS ELECTRIC AND GAS)
RATES)**

**KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY’S
MOTIONS TO CLARIFY OR RECONSIDER AND
MODIFY ORDERS OF FEBRUARY 18, 2021**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (jointly “the Companies”), by counsel, hereby respectfully move the Kentucky Public Service Commission (“Commission”) to clarify or to reconsider and modify its February 18, 2021 Orders (“Orders”) in these proceedings pursuant to KRS 278.400.

On November 4, 2020, the Companies asked the Commission for authority to defer the submission of their next RTO Membership Analyses until their 2021 Integrated Resource Planning (“IRP”) filing in October. The Companies also asked to submit subsequent RTO Membership Analyses in IRP filings only, rather than with their annual reports. On February 18, 2021, the

Commission granted the Companies' requested relief in part by allowing the Companies to file their RTO analyses at the same time as their triennial IRP filings. However, the Commission also required the Companies to continue to make annual filings by March 31st of each year, except for years in which an IRP filing must be made, and in those years, the analyses should be filed in conjunction with the IRP.

The Companies accept the Commission's decision to continue annual filing of the RTO analyses, but asks the Commission to reconsider the timing of such filings. The Companies' RTO Membership Analyses rely heavily on their annual Load Forecast, Generation Forecast and Fuel Forecast and as such, are an output of their routine business planning process. Because those studies and forecasts are typically not complete until late summer, the most appropriate timing to update the RTO analyses with the most recent information is the fall of each year. As a result, for a March 31st filing date, the Companies would have to rely on the prior year's studies and forecasts when conducting their RTO analyses. In addition, because the Companies are planning to file their IRP and this year's RTO analyses in October of 2021, the 2022 RTO filings will be due within six months yet again and thus very little is likely to change. For these reasons, the Companies respectfully request that the Commission modify the timing for filing their RTO analyses from March 31st to October 31st of each year.

WHEREFORE, KU and LG&E respectfully moves the Commission to reconsider its February 18, 2021 Orders in these proceedings and modify these Orders to require that Companies' RTO analyses be filed by October 31st of each year.

Dated: March 2, 2021

Respectfully submitted,



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CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Kentucky Utilities Company and Louisville Gas and Electric Company's March 2, 2021 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 2, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a true and correct copy in paper medium will be delivered to the Commission within 30 days of the lifting of the State of Emergency.



*Counsel for Louisville Gas and Electric
Company and Kentucky Utilities Company*