

JOE F. CHILDERS & ASSOCIATES

ATTORNEYS AT LAW
THE LEXINGTON BUILDING

201 West Short Street, Suite 300
Lexington, Kentucky 40507

Joe F. Childers, Esquire
childerslaw81@gmail.com

Telephone: (859) 253-9824
Facsimile: (859) 258-9288

VIA ELECTRONIC FILING AND COURIER

January 17, 2020

Gwen Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Re: Comments of Sierra Club, Alice Howell, Carl Vogel, Amy Waters, and Joe Dutkiewicz on the 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company, in Case No. 2018-348 Electronic 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company

Dear Ms. Pinson:

Please find enclosed for filing one copy of the Comments of Sierra Club, Alice Howell, Carl Vogel, Amy Waters, and Joe Dutkiewicz [collectively “Sierra Club”] on the 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company [the “Comments”], in Case No. 2018-00348 Electronic 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company [the “Companies”]. These documents are also being filed electronically. The above named parties were granted intervention by Order of the Commission on September 19, 2019.

Please note that Sierra Club is filing both a public, redacted version and a confidential, unredacted version of its Comments. More specifically, the public version attaches as an exhibit a redacted copy of the testimony of Dr. Jeremy Fisher on behalf of Sierra Club filed in Case Nos. 2018-294 and 2018-295, whereas the confidential version attaches as an exhibit an unredacted copy of the same that was also filed in those cases. The Commission accepted each filing, with their respective redactions and confidentiality designations, in those dockets. All of the redactions in the public version were made exclusively for the purpose of honoring and continuing the confidentiality designations that the Companies assigned to information they provided to Sierra Club in discovery responses. In those prior cases, the Companies filed Petitions for Confidential Protection with the Commission—namely, on December 6, 2018 (responding to Sierra Club’s initial set of discovery requests) and on January 2, 2019 (responding to Sierra Club’s supplemental set of discovery requests). In the instant docket, Sierra Club posed many of the same discovery requests to the Companies, in order to re-establish materially the

JOE F. CHILDERS & ASSOCIATES

ATTORNEYS AT LAW

Gwen Pinson
January 15, 2020
Page 2

same basis for Dr. Fisher's testimony in this docket, and the Companies again filed for Confidential Protection with the Commission, including on December 17, 2019, responding to Sierra Club's supplemental set of discovery requests. Accordingly, and consistent with the Confidentiality Agreements that Sierra Club has executed with the Company, Sierra Club's Comments, like the previously filed testimony of Dr. Fisher attached thereto, included redactions only to maintain the confidentiality of the same substance that the Company had previously designated as protected. Sierra Club did not redact anything for any other reason; its redactions exclusively relate to, and flow from, the Company's aforementioned designations and Petitions for Confidential Protection.

The electronically filed documents are a true representation of the original documents to be filed with the Commission. The unredacted version of Sierra Club's Comments, containing confidential information, is being filed in paper form under seal.

Thank you for your attention to this matter.

Sincerely,



JOE F. CHILDERS