

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

In the Matter of:

ELECTRONIC 2018 JOINT INTEGRATED RESOURCE	)	CASE NO.
PLAN OF LOUISVILLE GAS AND ELECTRIC	)	2018-00348
COMPANY AND KENTUCKY UTILITIES COMPANY	)	

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**COMMENTS OF SIERRA CLUB, ALICE HOWELL, CARL VOGEL, AMY WATERS,  
AND JOE DUTKIEWICZ ON THE STAFF REPORT ON THE 2018 JOINT  
INTEGRATED RESOURCE PLAN OF LOUISVILLE GAS AND ELECTRIC  
COMPANY AND KENTUCKY UTILITIES COMPANY**

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Pursuant to the Commission’s Order dated July 20, 2020, Sierra Club respectfully submits these Comments on the Staff Report on the Companies’ 2018 IRP.<sup>1</sup> As an initial matter, Sierra Club wishes to express its sincere appreciation of Staff’s efforts to scrutinize and provide recommendations on the Companies’ 2018 IRP.

Sierra Club’s reactions to the substance and conclusions of the Staff Report are mixed. That said, and reserving all rights to provide additional input at subsequent junctures on the various matters at issue in these proceedings, the only aspect of the Report on which Sierra Club wishes to comment at this time is its omission of analysis or recommendations on the OVEC-related issues raised in Sierra Club’s January 17, 2020, Comments (at pp. 2-6 & Exhibit A), and reacted to by the Companies in their February 17, 2020, Response (at 5-6).

To be sure, the Staff Report acknowledges Sierra Club’s and the Companies’ respective assertions and arguments about OVEC.<sup>2</sup> The Report further recognizes the Commission’s prior

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<sup>1</sup> These Comments adopt the same defined terms set out in Sierra Club’s January 17, 2020, Comments on the Companies’ 2018 IRP.

<sup>2</sup> Staff Report at 35-36 (noting Sierra Club’s comments on OVEC, *inter alia*); *id.* at 38 (noting the Companies’ response thereto).

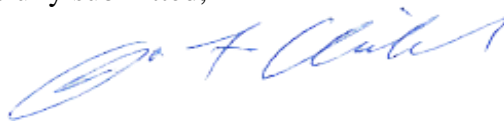
directive that these issues be reserved for this IRP docket.<sup>3</sup> Yet the Report does not go on to discuss the merits of these arguments or to offer any related conclusions or recommendations.

Sierra Club urges the Commission to address—as the Commission previously signaled it would<sup>4</sup>—the questions surrounding whether the Commission’s 2011 approval of the Companies’ OVEC agreement has become stale in light of material changed circumstances; and whether Kentucky ratepayers are, and will continue to be, unreasonably prejudiced thereby. These matters are expounded at pp. 2-6 and Exhibit A of Sierra Club’s earlier Comments; Sierra Club will not redundantly reproduce that discussion here. Sierra Club implores the Commission to review those materials, *inter alia*, and to issue any appropriate OVEC-related directives in furtherance of illuminating and alleviating this bad deal for the Companies’ customers.

Sierra Club thanks the Commission, Staff, the Companies, and the other parties for their consideration, and looks forward to continued engagement on the various matters at issue in these proceedings.

Dated: July 30, 2020

Respectfully submitted,



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<sup>3</sup> *Id.* at 38 n.157.

<sup>4</sup> Order (Apr. 30, 2019), at 29, Electronic Application of Louisville Gas and Electric Company for An Adjustment of Its Electric And Gas Rates, Case No. 2018-00295

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of the COMMENTS OF SIERRA CLUB, ALICE HOWELL, CARL VOGEL, AMY WATERS, AND JOE DUTKIEWICZ ON THE STAFF REPORT ON THE 2018 JOINT INTEGRATED RESOURCE PLAN OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY is being electronically transmitted to the Commission on July 30, 2020; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Per the Commission's general standing Order issued in Case No. 2020-00085 on March 16, 2020, this filing will not be mailed in paper medium to the Commission.



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JOE F. CHILDERS