

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION)	
OF LOUISVILLE GAS AND ELECTRIC)	
COMPANY AND KENTUCKY)	
UTILITIES COMPANY FOR)	
APPROVAL OF A SOLAR POWER)	
CONTRACT AND TWO RENEWABLE)	CASE NO. 2020-00016
POWER AGREEMENTS TO SATISFY)	
CUSTOMER REQUESTS FOR A)	
RENEWABLE ENERGY SOURCE)	
UNDER GREEN TARIFF OPTION #3)	

MOTION FOR EXTENSION OF TIME

Pursuant to 807 KAR 5:001, Section 5, Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively “the Companies”) move for an extension of time to comply with certain provisions of the Commission’s Order of May 8, 2020 related to the filing of revised tariff sheets.

In support of their Motion, the Companies state:

1. On May 8, 2020, the Commission issued an Order in this proceeding in which it approved a proposed revision to the Companies’ Green Tariffs to permit each Company to enter Renewable Power Agreements (“RPA”) with customers under Option #3 for a system cumulative 125 MW name plate AC period and ordered the Companies to submit revised tariff sheets reflecting this revision within 20 days. The May 8, 2020 Order further directed KU to submit within 20 days from the date of entry of this order the RPAs with Toyota and Dow as modified by this order.
2. The Companies intend to apply for rehearing of the Commission’s Order of May 8, 2020 to request clarification regarding other required modifications to Green Tariff Option #3 and

the regulatory treatment of the cost of energy purchased under their contract with Rhudes Creek Solar, LLC, as well as to request reconsideration of other provisions of that Order.

3. The Companies' filing of revised tariff sheets to reflect the increase in the cumulative energy that each may be provided under RPAs should be delayed pending a decision upon the Companies' Application for Rehearing.

a. The parties to the existing RPAs plan no action to implement the RPAs until the Commission has addressed the Companies' Application for Rehearing and clarified certain portions of its Order.

b. As a practical matter, neither the Companies nor any customer eligible under the existing Green Tariff will enter into an RPA until the uncertainty regarding the required modifications to Option #3 is resolved and the terms of Option are clarified and certain.

c. The submission of revised tariff sheets before these uncertainties are resolved serves no useful purpose, would result in the unproductive expenditure of resources, and should be deferred pending the Commission's decision on the Companies' Application for Rehearing.

WHEREFORE, the Companies move the Commission to extend the time in which they must file revised tariff sheets and modified RPAs with Toyota and Dow to comply with the Order of May 8, 2020 to 20 days following the issuance of an Order addressing the Companies' Application for Rehearing.

Dated: May 22, 2020

Respectfully submitted,




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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the electronic filing of this Motion by Kentucky Utilities Company and Louisville Gas and Electric Company is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on May 22, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Response in paper medium will be delivered to the Public Service Commission.



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