

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

In the Matter of:

**ELECTRONIC APPLICATION OF)
LOUISVILLE GAS AND ELECTRIC)
COMPANY FOR AN ADJUSTMENT)
OF ITS ELECTRIC AND GAS RATES,)
A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY)
TO DEPLOY ADVANCED METERING)
INFRASTRUCTURE, APPROVAL OF)
CERTAIN REGULATORY AND)
ACCOUNTING TREATMENTS, AND)
ESTABLISHMENT OF A ONE-YEAR)
SURCREDIT)**

CASE NO. 2020-00350

SIERRA CLUB’S POST-HEARING BRIEF

Sierra Club respectfully submits this Post-Hearing Brief pursuant to the Kentucky Public Service Commission’s (“Commission”) May 3, 2021, Order.

First, as discussed in the unanimous Stipulation and Recommendation (“Stipulation”) executed by the parties in this proceeding on April 19, 2021, Sierra Club urges the Commission to adopt the recommendations set out in the Stipulation, which purports to resolve the majority of the issues in this case. Sierra Club believes that the parties’ recommendations in the Stipulation would result in rates and other outcomes that are fair, just, and reasonable.

Second, regarding the net metering issues—left unresolved by the Stipulation, and addressed at length at the hearing in this case—Sierra Club urges the Commission to adopt the respective recommendations of Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and the Mountain Association (collectively the “Joint Intervenors”), and of Kentucky Solar Industries Association, Inc. (“KYSEIA”). For economy’s sake, Sierra Club will not recount

the evidence, analysis, and arguments in the record that favor the net metering tariffs advocated by Joint Intervenors and KYSEIA, respectively, over the tariffs requested by Louisville Gas and Electric Company. Instead, Sierra Club simply refers the Commission to the testimonies and post-hearing briefs filed by Joint Intervenors and KYSEIA. Alternatively, if and to the extent that the Commission is not inclined to adopt the net metering recommendations of either of those parties, Sierra Club urges the Commission to apply, in this case, the same analytical framework that the Commission recently applied in setting net metering tariffs for Kentucky Power Company in Case No. 2020-00174 (to the extent that framework is distinct from what Joint Intervenors and KYSEIA recommend).

Sierra Club takes no position on any other issue in this case, apart from those addressed above. Sierra Club thanks the Commission for its consideration of this Post-Hearing Brief and for its hard work to protect and serve Kentucky ratepayers.

Dated: May 24, 2021

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of the SIERRA CLUB'S POST-HEARING BRIEF in this action is being electronically transmitted to the Commission on May 24, 2021; 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.



JOE F. CHILDERS