

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY AND)	CASE NO.
KENTUCKY UTILITIES COMPANY FOR THE)	2021-00393
JOINT INTEGRATED RESOURCE PLAN)	

**SOUTHERN RENEWABLE ENERGY ASSOCIATION
MOTION TO INTERVENE**

Comes now the Southern Renewable Energy Association (also “SREA”), by and through counsel, and, under 807 KAR 5:001 Section 11, moves for leave to intervene into the instant case, the application of Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU” collectively “Companies”) for the Joint Integrated Resource Plan (“IRP”). In support of its motion to intervene, SREA states the following.

1. Southern Renewable Energy Association is a nonprofit corporation, with no shares of stock, incorporated under and in good standing with the laws of the State of Arkansas.
2. SREA’s full name, mailing address, electronic mail address, and website address:

Southern Renewable Energy Association
ATTN: Simon Mahan, Executive Director
5702 Old Hickory Road
Little Rock, AR 72204
simon@southernwind.org
www.southernrenewable.org

3. Established in 2013, SREA is an industry-led initiative. The purposes of SREA include, among other things, promoting the responsible use and development of wind energy, solar energy, energy storage and transmission solutions in the South. SREA has an interest in providing the most up-to-date publicly available market information regarding renewable

energy resource availability, pricing, performance, and forecasting in dockets concerning the integrated resource planning of electric utilities.

4. Through 807 KAR 5:058, the Companies are required to file, triennially with the Commission, an IRP. Integrated resource planning, among other things, requires an electric utility to report for formal review the Companies' determinations and analysis concerning energy resource and capacity needs over a fifteen (15) year period succeeding the base period. The Companies rely upon integrated resource planning for their resource procurement, including the procurement of renewable energy projects.
5. The formal process allows for on-the-record inquiry into and comments upon the IRP by Commission Staff and intervenors. The planning horizon for the review is substantially beyond the review period typical for a general adjustment in rates, and the public policy manifest through this administrative regulation is that the Companies' planning activity should be subject to a robust testing and informed commentary.
6. SREA's members are actively developing renewable energy projects in Kentucky. As part of this development activity, SREA is knowledgeable and active in matters pertaining to MISO. SREA has expert capacity to convey the interest of supply-side energy resources, specifically, large-scale renewable energy development companies. SREA's intent is to provide the most up-to-date publicly available market information regarding renewable energy resource availability, pricing, performance, and forecasting. SREA's intent is to enable this docket to accurately and adequately evaluate utility-scale renewable energy resources.
7. A grant of intervention to SREA is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting

the proceedings.¹ SREA has previously submitted comprehensive, well-documented written comments for other IRPs filed with this Commission.² SREA has also filed similar comprehensive, well-documented written comments in other jurisdictions including Arkansas, Georgia, Louisiana, Mississippi, North Carolina, and Tennessee. SREA is an official stakeholder in the Midcontinent Independent System Operator (MISO) processes. SREA also has experience with the Southeast Energy Exchange Market (SEEM).

8. The special interests of SREA and its members in the instant case is not otherwise represented by any other party.
9. SREA is represented by counsel and, if granted intervention, will comply with all provisions of the Commission's regulations including those related to service and electronic filing of documents and will waive any right to service of Commission orders via U.S. Mail. SREA certifies that it, or its agent, possess the facilities to receive electronic transmissions and otherwise participate through the electronic filing process, if granted intervention. All electronic mail messages to which notices and messages related to the above-styled proceeding are provided in the below signature block of counsel for SREA.

WHEREFORE, SREA respectfully requests the Commission to grant SREA intervention into the instant case with full rights of a party to the proceeding.

¹ See, for comparison, Case No. 2018-00348, *The 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, (Ky. P.S.C. Sept. 19, 2019) (threshold for intervention satisfied upon a finding that "Sierra Club will present issues and develop facts that will assist the Commission" in IRP proceeding).

² See: Case No. 2019-00443, *Electronic 2019 Integrated Resource Planning Report of Kentucky Power Company*, (IRP filed Dec. 11, 2019); Case No. 2019-00096, *Electronic 2019 Integrated Resource Plan of East Kentucky Power Cooperative, Inc.*, (IRP filed Mar. 20, 2019); Case No. 2018-00348, *The 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, (IRP filed Oct. 12, 2018); and Case No. 2017-00384, *The 2017 Integrated Resource Plan of Big Rivers Electric Corporation*, (IRP filed Sept. 21, 2017).

Respectfully submitted,

/s/ David E. Spenard

Randal A. Strobo
Clay A. Barkley
David E. Spenard
STROBO BARKLEY PLLC
730 West Main Street, Suite 202
Louisville, Kentucky 40202
Phone: 502-290-9751
Facsimile: 502-378-5395
Email: rstrobo@strobobarkley.com
Email: cbarkley@strobobarkley.com
Email: dspenard@strobobarkley.com
Counsel for SREA

NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 28th of October, 2021. Pursuant to the Commission's March 12, 2020, March 24, 2020, and July 22, 2021 Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

NOTICE AND CERTIFICATION CONCERNING SERVICE

Undersigned counsel certifies that it has, by electronic mail message, served and transmitted on this 28th day of October, 2021, an electronic copy of the pleading to the following:

Robert M. Conroy at robert.conroy@lge-ku.com
Allyson Sturgeon at allyson.sturgeon@lge-ku.com
Kendrick Riggs at kendrick.riggs@skofirm.com

J. Michael West at Michael.West@ky.gov
Lawrence W. Cook at Larry.Cook@ky.gov
Angela M. Goad at Angela.Goad@ky.gov
John G. Horne II at John.Horne@ky.gov

Matthew E. Miller at matthew.miller@sierraclub.org
Joe F. Childers at joe@jchilderslaw.com

/s/ David E. Spenard