

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

In the Matter of:

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

**COMMENTS OF JOINT INTERVENORS ON
COMMISSION STAFF'S REPORT**

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Dated: October 7, 2022

In accordance with the Jul 15, 2022 *Order* of the Public Service Commission (“Commission”), Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association (collectively “Joint Intervenors”) offer these Comments on the *Commission Staff’s Report on the 2021 Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company* (“Staff Report”).

Joint Intervenors sincerely appreciate the diligent work of Commission Staff throughout this proceeding, culminating in a detailed, well-supported, and thoughtful Throughout the Staff Report, Staff’s command of technical issues is clear, and application of internally consistent and fuel-neutral logics is commendable. Taken as a whole, Joint Intervenors expect that Staff Report’s Recommendations will greatly improve the Companies’ next IRP. Louisville Gas and Electric and Kentucky Utility Company (“LG&E/KU” or “Companies”) customers and Kentuckians generally stand a better chance of benefiting from truly least-cost planning thanks to Staff’s emphasis on fair, full, and integrated evaluation of all potentially cost-effective resource options on both sides of the meter, as prescribed by regulation.¹

Joint Intervenors further recognize LG&E/KU’s contributions to this proceeding, as well as those of the other stakeholders. This was a collaborative, non-adversarial, and constructive review of the Companies’ 2021 integrated resource planning. While even greater collaboration and transparency can be achieved,² Joint Intervenors nonetheless appreciate the considerable engagement and transparency that the Companies provided in this proceeding. The Companies produced all the modeling files available without hesitation, made their modeling team available

¹ *E.g.*, Commission Staff’s Report at 53 (discussing 807 KAR 5:0058, Section 8(1)–(2)).

² *E.g.*, Joint Intervenors April 22, 2022 Initial Comment, Ex. 1 IRP Modeling Report, at 6–8, 12–13.

to informally confer with external experts, facilitating common understanding of LG&E/KU's analyses, and the Companies' witnesses responded with frank answers over a two-day hearing.

This engagement from the Companies had value in its own right and honored stakeholders' investments in this proceeding. In Joint Intervenors' particular case, that investment was considerable. Volunteers and staff from the Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association contributed countless hours to reviewing every page of material the Companies shared, digesting the information, and sharing their views with one another. Joint Intervenors also enlisted the support of modeling experts who performed an independent review of the IRP and offered specific recommendations to strengthen the Companies' future resource planning using the resources already at hand. These efforts, alongside those of all intervenors, depended on some degree of collaboration and candor from the Companies, and it was all undertaken with an eye to ensuring robust least-cost planning.³

Although Staff's Report does not specifically address it, Joint Intervenors hope that going forward this sort of collaboration and transparency will continue and deepen in future IRPs. Sincere collaborative planning efforts among utilities and all stakeholders are critical to achieving our shared goal of reliable, low-cost power for all customers.

Affordability and resilience are essential components of realizing that shared goal of integrated resource planning. As Louisville/Jefferson County Metro Government noted

³ *E.g.*, Joint Intervenors Sept. 6, 2022 Post-Hearing Response at 3 (“Whatever the outcome, Joint Intervenors continue to urge integrated evaluation of all potentially cost-effective resources on equal footing.”).

throughout this proceeding, energy burdens do not fall on all customers equally,⁴ and some resources go further than others when it comes to improving bill affordability.⁵ Joint Intervenors look forward to continued collaboration with the Companies and stakeholders through the DSM/EE Advisory Group and in the Companies' next IRP filing. The completion of the roll-out of second-generation AMI equipment should enable even richer data and greater opportunities to maximize customer value through demand response, energy efficiency, and distributed energy resources.⁶

Respectfully submitted,



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⁴ Louisville Metro April 22, 2022 Initial Comment at 3 (“Half the low-income households in Louisville have an energy burden greater than 7.6%, and a quarter of them, over 12.7%.”).

⁵ See Louisville Metro April 22, 2022 Initial Comment at 2–5; *id.* at 2–3 (April 22, 2022) (“Home energy efficiency retrofits will play a significant role in both reducing greenhouse gas emissions and lowering energy burden for low-income families in Louisville, who often live in older homes that are less energy efficient due to older windows that leak air, gaps in insulation, and older appliances.”).

⁶ Joint Intervenors April 22, 2022 Initial Comment, Sec. II & III, at 8–30.

CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, this is to certify that the electronic filing was submitted to the Commission on October 7, 2022; that the documents in this electronic filing are a true representations of the materials prepared for the filing; that no hard copy of this filing will be made; and that the Commission has not excused any party from electronic filing procedures for this case at this time.

A handwritten signature in black ink, appearing to read 'Tom FitzGerald', with a long horizontal stroke extending to the right.

Tom FitzGerald