

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**MOTION TO INTERVENE OF  
LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT**

Louisville/Jefferson County Metro Government (Louisville Metro), by undersign counsel and pursuant to 807 KAR 5:001, Section 4(11), hereby requests that it be allowed leave to intervene as a party in the instant matter. In support of its motion, Louisville Metro states the following.

Louisville Metro is a consolidated local government established under KRS Chapter 67C. Its address is 527 West Jefferson Street, Louisville, Kentucky 40202.

Requests for intervention in proceedings before the Commission is governed by 807 KAR 5:001, Section 4(11). That regulation provides as follows:

The commission shall grant a person leave to intervene if the commission finds that he or she has made a timely motion for intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.”

Louisville Metro satisfies all elements of 807 KAR 5:001, Section 4(11), and should therefore be allowed to intervene in this matter.

First, Louisville Metro’s motion for intervention is timely filed. The current procedural schedule for this proceeding, which was issued on November 12, 2021, establishes a deadline of

December 13, 2021, for filing requests for intervention. Louisville Metro's motion to intervene has been submitted prior to the currently established intervention deadline.

Second, Louisville Metro has a special interest in this matter that is not otherwise adequately represented. Louisville Metro is a significant customer of Louisville Gas and Electric Company (LG&E), having approximately 1,400 accounts that receive electric service from LG&E. Louisville Metro consumes approximately 100,000,000 kWh annually. In recent years, Louisville Metro pays approximately \$11 – \$12 million to LG&E for electric service annually, which costs are anticipated to increase due to an increase LG&E's electric rates and the resumption of in-person work. LG&E's Integrated Resource Plan (IRP) directly lays the foundation for the company's near- and long-term supply- and demand-side infrastructure investment and retirement decisions which directly impact rates and thus the affordability of Louisville Metro's electricity supply. Furthermore, the continuous, resilient operation of Louisville Metro government is of significant public interest and depends heavily on a safe, adequate, and reliable electricity supply. The proposed investments in the joint IRP may have significant implications for the safety, reliability, and adequacy of the electricity system and will materially impact Louisville Metro's ability to respond to high impact events in the future (e.g., extreme weather, natural disasters, terrorism, and/or man-made threats) events.<sup>1</sup> Additionally, on February 12, 2020, Louisville Metro Mayor Greg Fischer formally signed Louisville Metro Resolution No. 0009, Series 2020, in which the Louisville Metro Legislative Council resolved to support a 100 percent clean, renewable electricity goal for Louisville Metro government operations by 2030 and a 100 percent clean,

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<sup>1</sup> Louisville Metro recognizes that the integrated resource plan submitted by LG&E is done jointly with the company's sister company, Kentucky Utilities Company (KU), due to the fact that LG&E and KU operate and dispatch their generating resources as a combined system rather than as a separate system to provide electric service to each company's customers. The references to LG&E specifically in this motion is simply due to Louisville Metro being an LG&E customer and not a customer of KU.

renewable energy goal for the entire community by 2040.<sup>2</sup> The renewable ordinance also voiced support for revising building codes for new construction to require energy efficiency, conservation, and renewable energy applications toward an eventual goal of net zero or net positive energy, water, and waste for Louisville Metro. In light of (a) Louisville Metro’s obligation to comply with Metro Resolution No. 009 Series 2020, (b) LG&E’s long-range resource planning having a significant impact on the achievability of Louisville Metro’s renewable energy goals, and (c) the lack of alignment between LG&E and KU’s current integrated resource plan proposal and Louisville Metro’s renewable energy goals, it is evident that Louisville Metro has a special interest in this matter that is not otherwise adequately represented.

Lastly, Louisville Metro will likely present issues or develop facts that will assist the Commission in fully considering the matter through additional, value-additive analytical and evaluative exercises that will not unduly complicate or disrupt the proceedings. At this time, Louisville Metro anticipates assessing the following aspects of the joint IRP in order to ensure a least-cost, reliable, and socially equitable portfolio of proposed investments is ultimately selected in the public interest: (1) LG&E’s supply side resource analysis, including any capacity expansion exercises, production cost modelling exercises, and any other relevant electricity sector modelling exercises that informed LG&E’s proposal; (2) LG&E’s cost-benefit assessment of joining a regional transmission organization; and (3) LG&E’s analysis of the technical and economic potential of demand-side management, energy efficiency, and energy conservation resources in LG&E’s service territory,<sup>3</sup> particularly in light of LG&E’s recent approval to implement its

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<sup>2</sup> A copy of the resolution is attached as an exhibit to the motion.

<sup>3</sup> The renewable energy ordinance on pages 2-3 speaks to the fact that “low-income residents are often most burdened by energy costs and climate impacts, and Louisville Metro is committed to ensuring all residents enjoy the benefits of energy efficiency” and “Louisville Metro’s energy use could be substantially served by existing renewable energy and efficiency technologies and energy conservation at reasonable cost.”

system-wide Advanced Metering Infrastructure project. Louisville Metro desires to play a constructive role in this matter and isolate issues that are most important to it. Louisville Metro's focus will serve to neither unduly complicate nor disrupt the proceeding. Louisville Metro believes that its prior involvement in other cases before the Commission demonstrates its productive standing in the process.

Attorneys for Louisville Metro below possess the facilities to receive electronic transmission of all notices and messages related to this proceeding at the electronic mailing addresses listed below. All correspondence to Louisville Metro should be sent to the attorneys' addresses or email addresses listed below.

Accordingly, because Louisville Metro has a special interest in this case that is not otherwise adequately represented and because it 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, Louisville Metro respectfully requests intervention in this proceeding.

Respectfully submitted,

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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 December 6, 2021; that the documents in this electronic filing is a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.

/s/ Quang Nguyen  
Counsel for Louisville Metro