

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

**In the Matter of:**

<b>ELECTRONIC INVESTIGATION OF</b>	)	
<b>AMENDMENTS TO THE PUBLIC</b>	)	<b>CASE NO. 2022-00369</b>
<b>UTILITY REGULATORY POLICIES</b>	)	
<b>ACT OF 1978 AND ELECTRIFICATION</b>	)	
<b>OF TRANSPORTATION</b>	)	

**JOINT COMMENTS OF**  
**KENTUCKY UTILITIES COMPANY AND**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, the “Companies”), pursuant to the Commission’s November 7, 2022 Order in this proceeding, hereby submit their comments concerning amendment of Section 111(d) of the Public Utility Regulatory Policies Act of 1978 (“PURPA”) regarding transportation electrification.

**I. The Companies’ Existing Measures to Promote Electrification of the Transportation Sector**

The Companies have a number of existing measures in place to promote transportation electrification:

- **Utility-Owned Electric Vehicle Charging Infrastructure.** In addition to providing electric vehicle (“EV”) charging rates for charging stations owned by others as discussed below, the Companies own and operate 20 Level 2 EV charging stations across their Kentucky service territories.<sup>1</sup> As the Companies stated in their 2020 rate cases, they are planning to install up to 8 total EV fast-charging stations, the ultimate number being determined by the ability to obtain matching funds through the National Electric Vehicle Infrastructure (“NEVI”) formula funding process or the state’s VW settlement funds.<sup>2</sup> If the Companies do not receive matching funds, they will still deploy four total fast chargers,

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<sup>1</sup> See <https://lge-ku.com/environment/alternate-fuels-road/ev/charging>.

<sup>2</sup> See, e.g., *Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric 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. 2020-00349, Testimony of Eileen L. Saunders at 40-41 (Nov. 25, 2020); *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 Meter Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit Case*, Case No. 2020-00350, Testimony of Eileen L. Saunders at 39-41 (Nov. 25, 2020).

two in each service territory.<sup>3</sup> As part of their EV charging station deployment efforts, the Companies conducted and filed with the Commission an EV Charging Station Location Study on June 17, 2022, providing a comprehensive look at key data affecting EV charging station siting decisions in the Companies' service territories.<sup>4</sup>

- **LG&E-KU Fleet Electric Vehicles.** The Companies have added Ford Fusions (hybrid), Chevy Bolts (all-electric), and Ford Escapes (plug-in hybrids) to their vehicle fleet, and they have Ford F150 Lightning (all-electric) trucks on order for 2023. The Companies have also begun installing electric power take off (“ePTO”) units on their heavy duty trucks to reduce or eliminate engine idling while using implements such as buckets. The Companies have targeted full electrification of light-duty vehicles and 50% electrification of medium and heavy vehicles by 2030,<sup>5</sup> and they have targeted equipping 80% of all aerial devices with ePTO by 2030.
- **Electric Vehicle-Related Communications, Promotion, and Education.** The Companies provide information about and promote electric vehicles. For example, the Companies have a portion of their website dedicated to electric vehicles,<sup>6</sup> including information about home EV charging,<sup>7</sup> where to find EV charging stations,<sup>8</sup> and hosting a charging station,<sup>9</sup> and it provides direct access to an online EV marketplace.<sup>10</sup> The Companies also promote EV awareness efforts and events such as National Drive Electric Week,<sup>11</sup> and they provide promotion and education around efforts like Metro Louisville’s Green Fleet Challenge.<sup>12</sup>
- **Industry Involvement.** The Companies are actively involved in industry groups and forums related to the electrification of the transportation sector. For example, the Companies are members of the Edison Electric Institute’s (“EEI”) National Electric Highway Coalition, which is a coalition of more than 60 investor-owned and municipal electric companies and electric cooperatives committed to providing EV fast charging stations along major U.S. travel corridors by the end of 2023.<sup>13</sup> In addition, the Companies’ Vice President of Customer Services and Vice President of Electric Distribution participate in the EEI Electric Transportation CEO Task Force. Furthermore, the Companies actively participate in the Electric Power Research Institute (“EPRI”) electric transportation program to stay informed on industry developments and best practices from other peer

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<sup>3</sup> *Id.*

<sup>4</sup> Available at [https://psc.ky.gov/psccef/2020-00349/rick.lovekamp@lge-ku.com/06172022103255/Closed/2-LGE\\_KU\\_EV\\_Charging\\_Station\\_Location\\_Study.pdf](https://psc.ky.gov/psccef/2020-00349/rick.lovekamp@lge-ku.com/06172022103255/Closed/2-LGE_KU_EV_Charging_Station_Location_Study.pdf).

<sup>5</sup> See PPL Investor Day Presentation, “Delivering Leading Financial Performance Through an Affordable Clean Energy Future” at 36 (June 9, 2022), available at:

[https://investors.pplweb.com/download/PPL\\_2022\\_Investor+Day\\_vFINAL\\_Website.pdf](https://investors.pplweb.com/download/PPL_2022_Investor+Day_vFINAL_Website.pdf).

<sup>6</sup> <https://lge-ku.com/environment/alternate-fuels-road/ev>

<sup>7</sup> <https://lge-ku.com/ev/charging-at-home>

<sup>8</sup> <https://lge-ku.com/environment/alternate-fuels-road/ev/charging>;

[https://afdc.energy.gov/fuels/electricity\\_locations.html#/find/nearest?fuel=ELEC&location=kentucky](https://afdc.energy.gov/fuels/electricity_locations.html#/find/nearest?fuel=ELEC&location=kentucky)

<sup>9</sup> <https://lge-ku.com/environmental/environment/alternate-fuels-road/ev/hosting>

<sup>10</sup> <https://lgekucars.efficientchoice.com/>

<sup>11</sup> <https://lge-ku.com/newsroom/articles/2022/08/01/charging-down-road-toward-electric-vehicle-future>

<sup>12</sup> <https://louisvilleky.gov/government/sustainability/green-fleet-challenge>

<sup>13</sup> See <https://www.eei.org/en/issues-and-policy/national-electric-highway-coalition>.

utilities in the area of vehicle electrification. Finally, the Companies participate in the Association of Edison Illuminating Companies (“AEIC”) Distributed Energy Resources (“DER”) subcommittee, which helps the Companies stay informed concerning best practices for integrating electric vehicles and charging equipment into utility systems and controls for grid optimization.

- **EV-Supportive Advocacy at the Commission.** In addition to advocating for their own EV-friendly tariff provisions before the Commission, the Companies filed comments in Case No. 2018-00372 supporting the position that EV charging stations that provide unidirectional charging service (i.e., not permitting EV discharging back onto a utility’s grid) should not be regulated as utilities.<sup>14</sup> The Commission accepted that EV-supportive position in its final Order, removing a potential obstacle to EV charging stations not owned by utilities.<sup>15</sup>

## II. The Companies’ Existing Rate Mechanisms Related to Electrification of the Transportation Sector

The Companies have a number of existing rate mechanisms related to the electric transportation sector:

- **EV Charging Station Leasing Tariff Provisions.** The Companies have two tariff provisions, Rate EVSE and Rider EVSE-R, through which customers who desire to install Level-2 EV charging stations may lease them from the Companies.<sup>16</sup> There are currently seven customers taking service under these provisions, with a total of nine charging stations deployed. The nine stations provide 12 charging ports for EV drivers.
- **Electric Vehicle Charging Service.** The Companies have two EV charging-specific rates, Electric Vehicle Charging Service - Level 2 (Rate EVC-L2) and Electric Vehicle Fast Charging Service (Rate EVC-FAST) that apply to EV charging stations owned and operated by the Companies.<sup>17</sup>
- **Time of Day Rates.** The Companies have time-of-day energy rates available to residential customers (Rate RTOD-Energy) and general service customers (Rate GTOD-Energy), which can help make home EV charging or overnight EV fleet charging for small

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<sup>14</sup> *Electronic Investigation of Commission Jurisdiction Over Electric Vehicle Charging Stations*, Case No. 2018-00372, Companies’ Comments (Mar. 1, 2019).

<sup>15</sup> Case No. 2018-00372, Order (Ky. PSC June 14, 2019).

<sup>16</sup> See Kentucky Utilities Company P.S.C. No. 20, Original Sheet Nos. 41-41.2 (KU Rate EVSE); Kentucky Utilities Company P.S.C. No. 20, Original Sheet Nos. 75-75.2 (KU Rider EVSE-R); Louisville Gas and Electric Company P.S.C. Electric No. 13, Original Sheet Nos. 41-41.2 (LG&E Rate EVSE); Louisville Gas and Electric Company P.S.C. Electric No. 13, Original Sheet Nos. 75-75.2 (LG&E Rider EVSE-R).

<sup>17</sup> See Kentucky Utilities Company P.S.C. No. 20, First Revision of Original Sheet Nos. 42-42.1 (KU EVC-L2); Kentucky Utilities Company P.S.C. No. 20, First Revision of Original Sheet Nos. 43-43.1 (KU EVC-FAST); Louisville Gas and Electric Company P.S.C. Electric No. 13, First Revision of Original Sheet Nos. 42-42.1 (LG&E EVC-L2); Louisville Gas and Electric Company P.S.C. Electric No. 13, First Revision of Original Sheet Nos. 43-43.1 (LG&E EVC-FAST).

businesses more affordable.<sup>18</sup> All of the Companies' customers have access to time-of-day demand rate schedules, all of which provide lower energy rates than rate schedules that lack demand charges, and all of which provide demand-charge incentives to charge EVs off-peak, primarily at night and on weekends.

- **Cost Recovery for Utility-Owned EV Charging Stations.** The Commission has approved base rate cost recovery for the Companies' Level 2 charging stations.<sup>19</sup>

### III. Appropriate Measures to Promote Greater Electrification of the Transportation Sector

In addition to the Companies' existing measures and rate mechanisms to enable and promote electrification of the transportation sector, the Companies are currently exploring or pursuing the following additional measures:

- **Optimized Charging Program.** In a recently filed application, the Companies are seeking approval for an optimized EV charging program as part of their proposed 2024-2030 Demand-Side Management and Energy Efficiency Program Plan.<sup>20</sup> This program will allow demand conservation and load shifting for EV charging through compatible electric vehicles and electric vehicle supply equipment (chargers), helping minimize the impact of increasing amounts of EV charging on peak loads.
- **Exploring Use of Meter Collar Devices.** The Companies are exploring options to permit use of meter collar devices. Such devices can, among other things, allow more rapid interconnection of home or business EV charging stations, minimizing the need to upgrade service panels or related customer-owned infrastructure.
- **Tariff Provisions for Home and Business EV Charging.** In the Companies' 2020 rate cases, the Commission directed each of the Companies to "develop and file on or before its next base rate case an EV tariff for home and business charging that is cost-based and [incentivizes] off-peak EV charging."<sup>21</sup> The Companies plan to file tariff provisions for home and business EV charging rates that meet the Commission's requirements, including the timing of such filing.

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<sup>18</sup> Kentucky Utilities Company P.S.C. No. 20, Original Sheet Nos. 6-6.2 (KU RTOD-Energy); Kentucky Utilities Company, P.S.C. No. 20, Original Sheet Nos. 11-11.1 (KU GTOD-Energy); Louisville Gas and Electric Company P.S.C. Electric No. 13, Second Revision of Original Sheet Nos. 6-6.2 (LG&E RTOD-Energy); Louisville Gas and Electric Company P.S.C. Electric No. 13, Third Revision of Original Sheet Nos. 11-11.1 (LG&E GTOD-Energy).

<sup>19</sup> See, e.g., Case No. 2020-00349, Order (Ky. PSC June 30, 2021); Case No. 2020-00350, Order (Ky. PSC June 30, 2021).

<sup>20</sup> See *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Approval of a Demand Side Management Plan*, Case No. 2022-00402, Application (Dec. 15, 2022).

<sup>21</sup> Case No. 2020-00349, Order at 63 (Ky. PSC June 30, 2021); Case No. 2020-00350, Order at 70 (Ky. PSC June 30, 2021).

- **Commercial Fleet Electrification Guidance and Consulting.** The Companies are currently engaging with customers who are seeking to electrify their fleets, and as the Companies gain more experience with electrifying their own vehicle fleet, they will share their experience and expertise with their customers who are seeking to make the same transition. This process informs long-term system planning efforts to support the growing energy needs of our customers. This also provides a chance to work with customers to integrate their EV charging equipment into utility platforms that can minimize or eliminate costly increases in electric demand.
- **Fleet Charging Optimization.** As increasing numbers of commercial and industrial customers electrify their vehicle fleets, it is increasingly important for those customers to find ways to optimize their EV charging activity to reduce their demand charges and for the Companies to find ways to help reduce the impact on peak demands of that charging. The Companies are studying both rate and technology options to help address this challenge and opportunity.
- **Distribution System Load Balancing.** In addition to seeking ways to help minimize the effects of EV charging on system peak loads, the Companies are becoming increasingly well positioned to address local load issues that could arise from or be exacerbated by growing amounts of EV charging. One benefit of the Companies' advanced metering infrastructure is that the granular level of data it will provide, in concert with data from the Companies' distribution facilities, will help the Companies better manage and balance load on the distribution system, particularly insofar as the Companies are able to interact with and manage customers' EV charging facilities. The Companies are currently looking into options to address this challenge and opportunity, as well.

#### IV. Conclusion

Kentucky Utilities Company and Louisville Gas and Electric Company believe EVs present a tremendous opportunity for the Commonwealth. As Gov. Beshear has stated, Kentucky is the “undisputed electric battery capital of the United States of America.”<sup>22</sup> In addition, Kentucky has considerable automotive industry expertise and investment, poising it to become an even more vital part of America’s transportation future. The Companies are grateful to be able to offer these comments about the efforts they have already made and making now to help EVs become even more viable and economical in their service territories, too.

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<sup>22</sup> See, e.g., “Electric battery company plans \$2 billion factory in Bowling Green,” (Apr. 13, 2022) (“[Gov.] Beshear said Kentucky is the ‘undisputed electric battery capital of the United States of America.’”), available at [https://www.wdrb.com/in-depth/electric-battery-company-plans-2-billion-factory-in-bowling-green/article\\_eaa8df74-bb3c-11ec-959d-67c45528113c.html](https://www.wdrb.com/in-depth/electric-battery-company-plans-2-billion-factory-in-bowling-green/article_eaa8df74-bb3c-11ec-959d-67c45528113c.html).

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Respectfully submitted,



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**CERTIFICATE OF COMPLIANCE**

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on December 16, 2022, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink, appearing to read "A. B. Smith", is written above a horizontal line.

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and Louisville Gas and Electric Company*