

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	CASE NO. 2022-00402
AND SITE COMPATIBILITY)	
CERTIFICATES AND APPROVAL OF A)	
DEMAND SIDE MANAGEMENT PLAN AND)	
APPROVAL OF FOSSIL FUEL-FIRED)	
GENERATING UNIT RETIREMENTS)	

JOINT RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY
TO PETITION FOR REHEARING AND CORRECTED PETITION FOR REHEARING
OF JOINT INTERVENORS METROPOLITAN HOUSING COALITION,
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR ENERGY
SOCIETY, AND MOUNTAIN ASSOCIATION

Pursuant to 807 KAR 5:001 Section 5(2), Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively “Companies”) hereby respond to the November 27, 2023 Petition for Rehearing and the November 28, 2023 Corrected Petition for Rehearing (collectively “Petition”) of Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association. Contrary to the Petition, the Companies believe the Public Service Commission of Kentucky’s (“Commission”) November 6, 2023 Final Order in this proceeding adequately addressed the Companies’ proposal to increase the income eligibility level for Income Qualified Solutions from 200% to 300% of the federal poverty level. The Final Order clearly stated the parties’ positions and then approved the Companies’ Demand-Side Management and Energy Efficiency Program Plan as proposed.¹

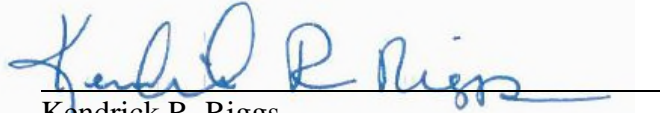
¹ Final Order at 159, 163-164, 166, 171, and 180.

Therefore, the Companies do not believe it is necessary for the Commission to grant rehearing to address this issue.

That notwithstanding, the Companies' goal in increasing the eligible income level for Income Qualified Solutions was solely to make the program available to more customers while also increasing the number of participants and the budget per home.² Thus, the Companies do not object to having an eligible income requirement of 200% of the federal poverty level for Income Qualified Solutions if the Commission decides to modify this determination in the November 6, 2023 Order when acting on the Petition.

Dated: December 1, 2023

Respectfully submitted,



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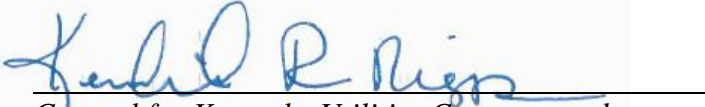
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² Companies' Reply Brief at 36.

CERTIFICATE OF SERVICE

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 1, 2023, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*