

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR A SITE)	CASE NO.
COMPATIBILITY CERTIFICATE FOR THE)	2024-00082
CONSTRUCTION OF A BATTERY ENERGY)	
STORAGE SYSTEM FACILITY AT E.W. BROWN)	
GENERATING STATION IN MERCER COUNTY,)	
KENTUCKY)	

VERIFIED APPLICATION

Louisville Gas and Electric Company (“LG&E”) (the “Company” or “Applicant”) pursuant to KRS 278.216 and 807 KAR 5:001, Section 14, hereby applies to the Public Service Commission (“Commission”) for a Site Compatibility Certificate for the construction of an approximate 125 MW, 4-hour (500 MWh) battery energy storage system (“BESS”) facility at KU’s E.W. Brown Generating Station (“Brown BESS”) in Mercer County, Kentucky. In support of this Application, the Company states as follows:

1. Addresses: Applicant LG&E’s full name and post office address is: Louisville Gas and Electric Company, 220 West Main Street, Post Office Box 32010, Louisville, Kentucky 40202.

The Company may be reached by electronic mail at the electronic mail addresses of its counsel set forth below.

2. Corporate Status. LG&E is incorporated in the Commonwealth of Kentucky, and attests it is in good corporate standing. LG&E was incorporated in Kentucky on July 2, 1913. LG&E is a public utility, as defined in KRS 278.010(3)(a), engaged in the electric and gas business. LG&E generates and purchases electricity, and distributes and sells electricity at

retail in Jefferson County and portions of Bullitt, Hardin, Henry, Meade, Oldham, Shelby, Spencer, and Trimble Counties. LG&E also purchases, stores, and transports natural gas, and distributes and sells natural gas at retail in Jefferson County and portions of Barren, Bullitt, Green, Hardin, Hart, Henry, Larue, Marion, Meade, Metcalfe, Nelson, Oldham, Shelby, Spencer, Trimble, and Washington Counties.

3. Notice of Election. Pursuant to 807 KAR 5:001 Section 8, on March 26, 2024, the Company filed with the Commission notice of its intent to use electronic filing procedures in this proceeding. Copies of all orders, pleadings and other communications related to this proceeding should be directed to:

Robert M. Conroy
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4. Facilities to be Constructed. In Case No. 2022-00402,¹ the Company sought, among other things and pursuant to KRS 278.020, a Certificate of Public Convenience and

¹ Case No. 2022-00402, *Electronic Joint Application of Louisville Gas and Electric Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of a Demand Side Management Plan and Approval of Fossil Fuel-Fired Generating Unit Retirements.*

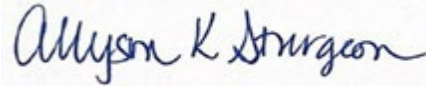
Necessity (“CPCN”) authorizing the construction of the Brown BESS Facility. By Order of November 6, 2023 in Case No. 2022-00402, the Commission granted a CPCN for the Brown BESS Facility. In that order, the Commission found that “because battery energy storage systems convert electricity into other forms of energy, and then are able to produce electricity from converting the energy again, they do not store electricity, but instead generate it” and thus required LG&E/KU to file an application for a site compatibility certificate to construct Brown BESS at the Brown Generating Station in a separate proceeding. Thus, the Company now seeks a Site Compatibility Certificate pursuant to the Commission’s November 6, 2023 Order.

5. Site Assessment Report (KRS 278.216 and 278.708(3)(4)). KRS 278.216(1) requires a utility to obtain a Site Compatibility Certificate before it begins construction of a facility for the generation of electricity capable of generating in aggregate more than ten megawatts (10 MW). As noted above, because the Commission has previously determined that the Brown BESS Facility will generate electricity equal to or greater than 10 MW, a Site Compatibility Certificate is required. Additionally, KRS 278.216(2) requires the submission of a Site Assessment Report as prescribed by KRS 278.708(3) and (4). The required Site Assessment Report is attached as Exhibit 1. The Site Assessment Report demonstrates that the Company’s plans for the Brown BESS Facility satisfy the requirements for a Site Compatibility Certificate. Specifically, the construction of the facility will not cause a negative impact to local property values, unduly increase traffic or noise, nor change the visual impacts of the facility from what already exists.

WHEREFORE, the Company respectfully requests the Commission to issue an Order granting a Site Compatibility Certificates for the Brown BESS Facility and for any and all other relief to which the Company may appear entitled.

Dated: March 28, 2024

Respectfully submitted,

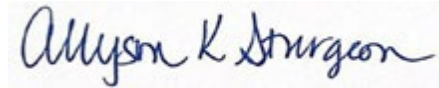


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*Counsel for Louisville Gas and Electric
Company*

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 March 28, 2024; 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 that reads "Allyson K. Sturgeon". The signature is written in a cursive style with a horizontal line underneath the name.

*Counsel for Louisville Gas and Electric
Company*