

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

In the Matter of:

ELECTRONIC 2024  
INTEGRATED RESOURCE PLAN OF  
DUKE ENERGY KENTUCKY, INC.

CASE  
NO. 2024-00197

**COMMENTS OF KENTUCKY SOLAR ENERGY SOCIETY,  
KENTUCKIANS FOR THE COMMONWEALTH, AND KENTUCKY  
RESOURCES COUNCIL REGARDING THE COMMISSION STAFF'S  
REPORT**

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Dated: April 21, 2025

**COMMENTS OF KENTUCKY SOLAR ENERGY SOCIETY,  
KENTUCKIANS FOR THE COMMONWEALTH, AND KENTUCKY  
RESOURCES COUNCIL REGARDING THE COMMISSION STAFF'S  
REPORT**

Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Kentucky Resources Council (collectively, "Joint Intervenors"), in accordance with the January 17, 2025 Order of the Kentucky Public Service Commission ("Commission") setting out posthearing procedure in this matter, as amended in its March 21 and April 07, 2025 Orders, herewith offer the below comments regarding the Staff Report filed April 07, 2025 in this matter.

First and foremost, the Joint Intervenors appreciate the opportunity to participate in this matter, and the diligence of the Commission and staff in reviewing and providing comment on across all Integrated Resource Plans ("IRPs") for Kentucky's five generation utilities. Joint Intervenors believe that the IRP process, as overseen by the Commission, including the opportunity for presentation of issues and development of facts through discovery, comments and hearing, continues to prove an invaluable way to assure prudent planning by Kentucky's utilities.

Joint Intervenors also appreciate the thoroughness of Commission Staff's evaluations of the extensive docket in this case. They offer only the following specific notes regarding Duke's IRP and Joint Intervenors' positions.

**Demand Side Management**

Joint Intervenors appreciate the note that "Joint Intervenors commented that Duke Kentucky failed to comply with the 807 KAR 5:058 Section 8(2)(b)

requirement that the utility evaluate potential DSM programs.”<sup>1</sup> They also appreciate Staff’s recommendation that Duke’s next IRP evaluate potential DSM programs.<sup>2</sup> Joint Intervenors only wish to note: (1) Staff made similar recommendations in its evaluation of the previous IRP, and Duke must take Staff recommendations seriously;<sup>3</sup> and (2) that Duke sister utilities in other jurisdictions already have several innovative programs implemented , “such as the Duke Carolinas Improve & Save Program, and Duke Carolinas and Duke Energy Progress PowerPair pilot program”<sup>4</sup> that Duke should include in such evaluation.

### **Supply-Side Resource Assessment**

Staff also generally summarize Joint Intervenors’ comments regarding supply-side resources and modeling.<sup>5</sup> Joint Intervenors also appreciate Staff’s belief in a “resource-neutral planning process,”<sup>6</sup> understanding this to mean all potential sources, including renewable generation as well as demand-side management, distributed resources, and transmission solutions should be placed on an equal footing, particularly with regard to evaluating potential reliability benefits.

[Signatures on following pages]

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<sup>1</sup> Order, Commission Staff’s Report on the 2024 Integrated Resource Plan of Duke Energy Kentucky, Inc. at 20 (April 07, 2025) (“Staff Report”).

<sup>2</sup> Staff Report at 35.

<sup>3</sup> Staff Report at 19.

<sup>4</sup> Comments of Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Kentucky Resources Council on Duke Energy Kentucky’s 2024 Integrated Resource Plan at 14-15 (Nov. 06, 2024) (“JI Comments”).

<sup>5</sup> Staff Report at 37.

<sup>6</sup> Staff Report at 38.

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 April 21, 2025; that the documents in this electronic filing are 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.

  
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