

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

ELECTRONIC 2024 JOINT)	
INTEGRATED RESOURCE PLAN)	
OF LOUISVILLE GAS AND ELECTRIC)	Case No. 2024-00326
COMPANY AND KENTUCKY)	
UTILITIES COMPANY)	

ATTORNEY GENERAL'S COMMENT ON COMMISSION STAFF'S REPORT

The Attorney General of the Commonwealth of Kentucky provides the following Comment on the Commission Staff's Report pursuant to the Commission's Order of May 19, 2025.

On July 31, 2025, Commission Staff filed its Report in this matter. The Attorney General previously filed Initial Comments in this matter on March 7, 2025. The Attorney stands by the recommendations made in those Initial Comments.

The Commission's Staff Report included a recommendation that "LG&E/KU should assign non-zero capacity values to solar resources in the winter."¹ This recommendation mirrors one found in the Brattle Report placed in the record by the Southern Renewable Energy Association ("SREA") on March 7, 2025. The Companies appropriately modeled solar and wind resources as offering a 0% capacity contribution in the winter. The Brattle Report attributes this decision of the Companies to the

¹ Commission Staff's Report at 51.

Companies' claim that winter peaks typically occur in non-daylight hours when solar resources are unavailable.²

Respectfully, the Companies' assumptions regarding the lack of winter capacity contribution of renewable resources are reasonable and should not be disturbed. During times of heightened resource adequacy risk, such as severe winter weather, the Companies should not gamble by relying on resources the operation of which is not guaranteed by human intervention. But that is what requiring a non-zero capacity contribution value for unreliable intermittent resources would cause. Such a requirement compels the assumption that such resources can be relied upon during conditions when common sense dictates they cannot. This inappropriate assumption wrongly stacks the deck in favor of unreliable intermittent resources, the selection of which would increase the risk of outages for ratepayers at their most vulnerable time.

The Attorney General suggests the Commission reconsider this directive at the appropriate procedural juncture.

² SREA-Sponsored Brattle Report at 11.

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



J. MICHAEL WEST
T. TOLAND LACY
LAWRENCE W. COOK
ANGELA M. GOAD
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE SUITE 200
FRANKFORT, KY 40601-8204
PHONE: (502) 696-5433
FAX: (502) 573-1005
Michael.West@ky.gov
Thomas.Lacy@ky.gov
Larry.Cook@ky.gov
Angela.Goad@ky.gov
John.Horne@ky.gov

Certificate of Service and Filing

Pursuant to the Commission's Order dated March 17, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that, on August 22, 2025, a copy of the forgoing was served on the individuals on the e-service list.

this 22nd day of August, 2025

A handwritten signature in blue ink, appearing to read "J. Michael Miller", is written over a faint, circular official seal.

Assistant Attorney General