

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY’S
POST-HEARING COMMENTS**

Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively “Companies”) provide the following post-hearing comments.

During the hearing in this proceeding, the Companies presented 14 witnesses who demonstrated the reasonableness of the Companies’ 2024 Integrated Resource Plan (“IRP”) and the Companies’ load forecasting and resource planning processes in general. Although certain intervenors sought to go beyond the scope the Commission set for the hearing, the IRP-relevant cross-examination of the Companies’ witnesses was thorough. The Companies’ witnesses’ testimony in response to that questioning showed the Companies take the IRP process seriously and that the 2024 IRP satisfies all the requirements of the IRP regulation. Perhaps most importantly, the Companies’ witnesses reiterated that, consistent with the chief purpose of the Commission’s IRP regulation, the goal of the Companies’ load forecasting and resource planning processes, both for the IRP and otherwise, is to provide safe and reliable service to *all* customers at the lowest reasonable cost.¹ The witnesses further showed the Companies’ IRP processes reasonably projected the future needs of existing customers and new loads from data centers and

¹ 807 KAR 5:058, Necessity, Function, and Conformity (“This administrative regulation prescribes rules for regular reporting and commission review of load forecasts and resource plans of the state's electric utilities to meet future demand with an adequate and reliable supply of electricity at the lowest possible cost for all customers within their service areas, and satisfy all related state and federal laws and regulations.”).

other economic development customers. The Companies' witnesses also demonstrated that the Companies' IRP processes resulted in a reasonable IRP recommended resource portfolio for meeting all customers' projected needs. Finally, the Companies' testimony showed that, like all IRPs, the 2024 IRP was a snapshot-in-time analysis based on the best information available at the time, which the Companies conducted and presented in accordance with the Commission's IRP regulation and recommendations from Commission Staff's reports on the Companies' prior IRPs.

But as was observed during the hearing, the current regulatory landscape is indeed one that can quickly change, making long-term planning for utilities particularly challenging. These changing circumstances highlight the importance of the Companies' no-regrets approach to resource planning, i.e., evaluating a wide range of load, fuel price, and environmental regulatory scenarios to determine which kinds of supply- and demand-side resources are most robust across the broadest range of reasonably possible circumstances. As discussed in the Companies' 2024 IRP, the Companies' rigorous planning processes show that additional natural gas combined-cycle resources, battery energy storage systems, and economical demand response measures are such robust resources. As demonstrated in the IRP and at the hearing, the Companies will need to add significant new resources in the near term to ensure they can meet the projected needs of all customers, including the anticipated data center and non-data-center economic development load reasonably projected in the 2024 IRP Load Forecast. The Companies' IRP further shows, and nothing discussed at the IRP hearing contradicted, the value of adding selective catalytic reduction ("SCR") to Ghent Unit 2 in the near term to ensure the unit can be available year-round to serve all customers' needs, including current customers and anticipated new customers.

Changing regulatory and economic circumstances also highlight the importance of not placing undue emphasis on a single resource plan or IRP, particularly regarding decisions that do

not have to be made in the near term. There is wisdom in the Commission's IRP regulation, which requires utilities to conduct 15-year IRP analyses every three years instead of every 15 years. No such planning process, no matter how sophisticated or refined, can provide perfect, infallible foresight into future conditions. Moreover, projections many years into the future are less likely to align with actual outcomes because of so many uncertainties. Therefore, although the 2024 IRP provides helpful insights concerning near-term resource decisions, it is not and should not be viewed as a concrete, actionable 15-year resource plan; rather, it is a useful planning exercise to help inform the Commission and others concerning how the Companies conduct their resource planning and to receive ideas and constructive criticism from the Commission Staff and intervenors to refine and improve the Companies' planning processes.

Finally, the Companies welcome opportunities to improve their planning and analytical processes. Therefore, the Companies look forward to receiving the Commission Staff's report and taking its recommendations into account in their next IRP.

Dated: June 16, 2025

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 June 16, 2025, 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 positioned above a horizontal line.

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