

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY AND LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR)	CASE NO.
CERTIFICATES OF PUBLIC CONVENIENCE)	2025-00045
AND NECESSITY AND SITE COMPATIBILITY)	
CERTIFICATES)	

**SOUTHERN RENEWABLE ENERGY ASSOCIATION
MOTION TO INTERVENE**

Comes now the Southern Renewable Energy Association (“SREA”), by and through counsel, and, under 807 KAR 5:001 Section 4(11), moves for leave to intervene into the instant proceeding, the Joint Application of Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”)(collectively “Companies”) for, among other things, Certificates of Public Convenience and Necessity (“CPCN”) for the construction of two (2) approximately 645 megawatt (“MW”) net summer rating natural gas combined cycle combustions turbine (“NGCC”), one located in Mercer County, Kentucky with the second located in Jefferson County, Kentucky. The proposed facilities will include associated on-site natural gas and electric transmission construction.

The Joint Application further requests a CPCN for a 400 MW 4-hour (1600 megawatt hour (“MWh”)) lithium-ion battery energy storage system (“BESS”) facility located in Jefferson County, Kentucky and a CPCN for a selective catalytic reduction (“SCR”) facility in Carroll County, Kentucky. The Joint Application also requests site compatibility certificates for three (3) of the proposals. The Joint Application further

indicates that the Companies plan to construct the proposed projects primarily through a self-build process. In support of its motion to intervene, SREA states the following.

1. Southern Renewable Energy Association is a nonprofit corporation, with no shares of stock, incorporated under and in good standing with the laws of the State of Arkansas.

2. SREA's full name, mailing address, electronic mail address, and website address:

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3. Established in 2013, SREA is an industry-led initiative. The purposes of SREA include, among other things, promoting the responsible use and development of wind energy, solar energy, energy storage, and transmission solutions in the South, including Kentucky. SREA has an interest in providing the most up-to-date publicly available market information regarding BESS and renewable energy resource availability, pricing, performance, and forecasting in dockets concerning the integrated resource planning and subsequent resource procurement efforts of electric utilities.

4. The Order of procedure in the instant case requires, among other things, "a person requesting permissive intervention ... to demonstrate either (1) a special interest in the proceeding that is not adequately represented in the case, or (2) that the person ... is likely to present issues or develop facts that will assist the Commission

in fully considering the matter without unduly complicating or disrupting the proceedings.”¹

5. SREA has a special interest in this CPCN proceeding which is not otherwise adequately represented by any party in this case. As noted above, SREA has an interest in promoting the responsible development of wind energy, solar energy, energy storage, and transmission solutions in the South, including Kentucky. SREA also has an interest in supporting competitive procurement processes to test market assumptions and implement IRP plans, including requests for proposals of renewable energy and energy storage systems, as set forth in Recommendation #3 of SREA’s IRP comments.
6. SREA’s members are actively developing renewable energy and storage projects in Kentucky. As part of this development activity, SREA is knowledgeable and active in matters pertaining to the Midcontinent Independent System Operator (“MISO”), Southeast Regional Transmission Planning (“SERTP”), and the Southeast Energy Exchange Market (“SEEM”). SREA has expert capacity to convey the interest of supply-side energy resources, specifically, large-scale renewable energy development companies. SREA’s intent is to provide the most up-to-date publicly available market information regarding BESS and renewable energy resource availability, pricing, performance, and forecasting. SREA’s intent is to enable this docket to accurately and adequately evaluate the Companies’ proposed NGCC and BESS facilities, as well as to accurately and adequately

¹ Order (Ky. P.S.C. Mar. 13, 2025), pages 4 and 5 (citing 807 KAR 5:001, Section 4(11)(a)).

evaluate utility-scale renewable energy resources as alternatives for comparison with the Companies' proposed resource additions.

7. SREA has previously successfully intervened, participated in discovery, and submitted comprehensive, well-documented written comments for several integrated resource plans ("IRP") filed with this Commission including the three (3) most recent IRPs of KU and LG&E.²
8. IRPs discuss a utility's projected load growth and the resources planned to meet that growth.³ The Companies' currently pending IRP has been incorporated by reference into the record for the Commission's review of the Companies' Joint Application.⁴ The Companies' Joint Application is a result of that planning process, and SREA's participation in the planning process demonstrates that SREA is likely to present issues and develop facts that will assist the Commission in deciding the matter, specifically, whether the Commission should grant these CPCNs and approve the Companies plans to self-build the related facilities.

² See: Case No. 2024-00326, *Electronic 2024 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, (IRP filed Oct. 18, 2024); Case No. 2021-00393, *Electronic 2021 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, (IRP filed Oct. 19, 2021); Case No. 2018-00348, *The 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, (IRP filed Oct. 12, 2018); see also Case No. 2019-00443, *Electronic 2019 Integrated Resource Planning Report of Kentucky Power Company*, (IRP filed Dec. 11, 2019); Case No. 2019-00096, *Electronic 2019 Integrated Resource Plan of East Kentucky Power Cooperative, Inc.*, (IRP filed Mar. 20, 2019); and Case No. 2017-00384, *The 2017 Integrated Resource Plan of Big Rivers Electric Corporation*, (IRP filed Sept. 21, 2017).

³ See 807 KAR 5:058, Section 5.

⁴ Order (Ky. P.S.C. Mar. 13, 2025), page 4 (incorporated the record in Case No. 2024-00326 up to the filings made on or before February 14, 2025).

9. SREA has also, in other jurisdictions, filed similar comprehensive, well-documented written comments including in Arkansas, Georgia, Louisiana, Mississippi, North Carolina, and Tennessee. SREA is an official stakeholder in the MISO processes. SREA also has experience with SERTP and SEEM. SREA does possess the resources to assist this Commission.
10. SREA, with dedicated funding for this proceeding, seeks to continue its provisions of quantitative analysis in presenting issues and developing facts that will assist the Commission in developing a complete record in the instant case, wholly consistent with 807 KAR 5:001, Section 4(11)(a). The Companies' proposals should be subject to a robust testing and informed commentary.
11. If granted intervention, SREA will present issues and develop facts that will assist the Commission in fully considering the Companies' Application without unduly complicating or disrupting the proceedings. The direct linkage of the issues and facts in the instant case with the issues and facts of the Companies' integrated resource planning, particularly Case No. 2024-00326, is clearly established through the Commission's March 13, 2025 Order of procedure.
12. SREA is represented by counsel and, if granted intervention, will comply with all provisions of the Commission's regulations including those related to service and electronic filing of documents and will waive any right to service of Commission orders via U.S. Mail. SREA certifies that it, or its agent, possesses the facilities to receive electronic transmissions and otherwise participate through the electronic filing process, if granted intervention. All electronic mail messages to which notices

and messages related to the above-styled proceeding are provided in the below signature block of counsel for SREA.

WHEREFORE, SREA respectfully requests the Commission grant SREA intervention into the instant case with full rights of a party to the proceeding.

Respectfully submitted,

/s/ Randal A. Strobo

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notices that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 21st day of March 2025. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), the paper, in paper medium, is not required to be filed.

/s/ Randal A. Strobo

NOTICE AND CERTIFICATION CONCERNING SERVICE

Undersigned counsel certifies that it has, by electronic mail message, served and transmitted on this 21st day of March 2025, an electronic copy of the pleading to the following identified on the service list for this case:

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/s/ Randal A. Strobo