### **COMMONWEALTH OF KENTUCKY**

### **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	) ) ) ) ) CASE NO. 2025-00113 ) ) )
In the Matter of:	
ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES, AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	) ) ) ) CASE NO. 2025-00114 ) ) )

### **MOTION FOR DEVIATION**

Pursuant to 807 KAR 5:001, Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") (collectively, "Companies") move the Kentucky Public Service Commission ("Commission") for an order permitting the Companies: to provide abbreviated newspaper notice of their upcoming applications for rate adjustments pursuant to 807 KAR 5:001, Section 17(5); relief from the requirement of 807 KAR 5:001, Section 17(1)(a) and 807 KAR 5:011, Section 8(1)(a) to post the customer notice at its place of business; and to incorporate certain documents required by 807 KAR 5:001, Section 16 and available on SEC and FERC online data

bases into the record. This Motion is made to reduce the costs associated with the filing of applications, efficiently provide notice to customers about the filings, facilitate efficient adjudication of the rate cases and, ultimately, reduce the level of any rate adjustment for the Companies' customers.

In support of this Motion, the Companies respectfully state:

1. On April 4, 2025, the Companies advised the Commission that each expects to file an application with the Commission for a general rate adjustment and other related relief using a forecasted test period on or after May 30, 2025.

#### Method of Notice of Publication

2. 807 KAR 5:001, Section 17(2) requires a utility to provide notice to its customers of any general rate adjustment at the time of filing of its application and further sets forth the permissible form and manner of such notice. Historically, the Companies have found that the most practical and cost-effective of the four methods of notice established by the regulation is the publication of notice once a week for three consecutive weeks in a prominent manner in a newspaper of general circulation in its service area.<sup>1</sup>

3. While newspaper publication of a proposed rate adjustment is the most practical method of notice for the Companies, it is a significant undertaking.<sup>2</sup> In the Companies' 2016 rate

<sup>&</sup>lt;sup>1</sup> 807 KAR 5:001, Section 17(2)(b) provides: "If a utility has more than twenty (20) customers, it shall provide notice by:

<sup>1.</sup> Including notice with customer bills mailed no later than the date the application is submitted to the commission;

<sup>2.</sup> Mailing a written notice to each customer no later than the date the application is submitted to the commission;

<sup>3.</sup> Publishing notice once a week for three (3) consecutive weeks in a prominent manner in a newspaper of general circulation in the utility's service area, the first publication to be made no later than the date the application is submitted to the commission; or

<sup>4.</sup> Publishing notice in a trade publication or newsletter delivered to all customers no later than the date the application is submitted to the commission.

<sup>&</sup>lt;sup>2</sup> In its 2020 regular session, the Kentucky General Assembly recognized that the posting of notices on websites serves as a cost-effective substitute for the publication of lengthy newspaper notices by enacting House Bill 195. This

adjustment proceedings, KU published its complete notice ("Section 17 Notice") consisting of 19 single-spaced typewritten 8½ by 11 pages in 95 newspapers; LG&E published its complete notice consisting of 35 single-spaced typewritten pages in 18 newspapers.<sup>3</sup> In the Companies' 2018 rate adjustment proceedings, KU's complete customer notice consisted of 43 single-spaced typewritten 8½ by 11 pages. KU published notice in 91 newspapers.<sup>4</sup> LG&E's complete customer notice consisted of 65 single-spaced typewritten 8½ by 11 pages. LG&E published notice in 18 newspapers.<sup>5</sup>

4. Publication of the required notice is also very costly. The Companies collectively expended more than \$2.7 million to publish their complete notices in their 2016 rate case proceedings.<sup>6</sup> Judicial and Commission precedent requires that this amount must be recovered as a rate case expense through the newly established rates.<sup>7</sup> In the upcoming general rate case proceedings, the Companies do not foresee any material change in the length of the full notice or the number of newspapers in which notice must be published. If required to publish notice consistent with 807 KAR 5:001, Section 17(4), the Companies anticipate the level of expense

legislation, which is codified at KRS 424.145, provides an alternative method for local governments to publish lengthy legal notices by permitting the publication of an abbreviated notice in a newspaper of general circulation that provides a hyperlink to the lengthier notice located on the local government's website.

<sup>&</sup>lt;sup>3</sup> Electronic Application of Kentucky Utilities Company For An Adjustment of Its Electric Rates And For Certificates of Public Convenience and Necessity, Case No. 2016-00370, Certificate of Completed Notice (Ky. PSC filed Jan. 9, 2017); Electronic Application of Louisville Gas and Electric Company For An Adjustment of Its Electric and Gas Rates And For Certificates of Public Convenience and Necessity, Case No. 2016-00371, Certificate of Completed Notice (Ky. PSC filed Jan. 9, 2017).

<sup>&</sup>lt;sup>4</sup> *Electronic Application of Kentucky Utilities Company For an Adjustment of its Electric Rates*, Case No. 2018-00294, Tab 6 of Filing Requirements (Ky. PSC filed Sept. 28, 2018).

<sup>&</sup>lt;sup>5</sup> Electronic Application of Louisville Gas and Electric Company For an Adjustment of its Electric and Gas Rates, Case No. 2018-00295, Tab 6 of Filing Requirements (Ky. PSC filed Sept. 28, 2018).

<sup>&</sup>lt;sup>6</sup> Case No. 2016-00370, Supplemental Response to Commission Staff's First Request for Information, Item 60(c) (Ky. PSC filed Jan. 27, 2017); Case No. 2016-00371, Supplemental Response to Commission Staff's First Request for Information, Item 60(c) (Ky. PSC filed Jan. 27, 2017).

<sup>&</sup>lt;sup>7</sup> Driscoll v. Edison Light & Power Co., 307 U.S. 104, 120 (1939); West Ohio Gas Co. v. Public Utilities Comm'n, 294 U.S. 63, 74 (1935); Southern Bell Tel. & Tel. Co. v. Georgia Public Service Com., 49 S.E.2d 38 (Ga. 1948); Application and Notice of Campbell County Kentucky Water District (A) To Issue Revenue Bonds In The Approximate Principal Amount of \$5,535,000 (B) To Construct Additional Plant Facilities of Approximately \$4,523,000 (C) Notice of Adjustment of Rates Effective May 1, 1989 (D) Submission of Long Term Water Supply Contract, Case No. 89-029 (Ky. PSC Mar. 6, 1990).

associated with the publication of notice significantly in excess of that incurred for the 2016 general rate case proceedings as described in the publication cost estimates described below.

5. In an effort to reduce the notice costs that the Companies would pass on to customers as a product of these charges, the Companies sought and obtained the Commission's approval of abbreviated notices in its past two rate case proceedings.<sup>8</sup> In those cases, the Commission approved an abbreviated form of notice describing proposed residential rate changes,<sup>9</sup> changes to various other charges, and language directing interested parties to the addresses and contact information of the Companies and the Commission.<sup>10</sup> The Commission approved these abbreviated notices, finding that the proposed notice plan would create measurable customer savings, and that "the abbreviated notice would not reduce transparency of the rate application to be filed by LG&E" in light of its efforts to create public awareness through other means.<sup>11</sup>

<sup>&</sup>lt;sup>8</sup> Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for a Declaratory Order Establishing the Form of Notice and Number of Copies of Certain Documents Filed in Support of Upcoming Applications for Rate Adjustments, Case No. 2018-00250, Order (Ky. PSC Aug. 31, 2018, Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit, Case No. 2020-00349, Order (Ky. PSC Nov. 10, 2020);, Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit, Case No. 2020-00350, Order (Ky. PSC Nov. 10, 2020).

<sup>&</sup>lt;sup>9</sup> Case No. 2020-00350, Order at 5 (Nov. 10, 2020); Case No. 2020-00349, Order at 5(Nov. 10, 2020); Case No. 2018-00250, Order at 5-6 (Aug. 31, 2018).

<sup>&</sup>lt;sup>10</sup> 807 KAR 5:001 Section 17 (4)(e)-(h)

<sup>&</sup>lt;sup>11</sup> Case No. 2020-00350, Order at 4 (Ky. PSC Nov. 10, 2020). *See also* Case No. 2020-00349, Order (Ky. PSC Nov. 10, 2020); Case No. 2018-00250, Order at 5-6 (Ky. PSC Aug. 31, 2018).

6. The use of abbreviated notices in the Companies' 2018<sup>12</sup> and 2020<sup>13</sup> rate cases created roughly \$4 million in total savings on publication costs when compared to the costs of publishing the Section 17(4) Notice in their 2016 rate cases. These savings and the robust level of public participation in these cases<sup>14</sup> demonstrated that the Companies can both achieve significant savings for their customers and provide notice that is reasonably calculated to inform the public of the proceeding and provide adequate time to intervene.<sup>15</sup> Moreover, the availability of the Section 17 Notice in a digital format enabled the Companies to readily direct interested customers to notice that fulfills all of 807 KAR 5:001, Section 17(4)'s requirements.

7. The form of the Companies' proposed abbreviated notice for their respective 2025 rate cases is attached as Exhibit A.<sup>16</sup> It includes the requested rate increases on residential customers by percentage and dollars, the requested base rate and total revenue increases for the

Total: \$641,762

<sup>&</sup>lt;sup>12</sup> 2018 rate case proceeding costs:

KU: \$489,609.81 (Case No. 2018-00294, Supplemental Attachment 1 to Response to PSC-1 Question No. 59(c), Filed November 26, 2018).

LG&E – Electric: \$130,845.14 (Case No. 2018-00295, Supplemental Attachment 1 to Response to PSC-1 Question No. 59(c), Filed December 21, 2018).

LG&E – Gas: \$34,781.62 (Case No. 2018-00295, Supplemental Attachment 1 to Response to PSC-1 Question No. 59(c), Filed December 21, 2018).

Total: \$655,236.57

<sup>&</sup>lt;sup>13</sup> 2020 rate case proceeding costs:

KU: \$473,631 (Case No. 2020-00349, Supplemental Attachment to Response to PSC-1 Question No. 14(c), Filed December 15, 2020).

LG&E – Electric: \$132,516 (Case No. 2020-00350, Supplemental Attachment to Response to PSC-1 Question No. 14(c), Filed December 15, 2020).

LG&E – Gas: \$35,615 (Case No. 2018-00350, Supplemental Attachment to Response to PSC-1 Question No. 14(c), Filed December 15, 2020).

<sup>&</sup>lt;sup>14</sup> See generally KU: Case No. 2020-00349, Public Comments (https://psc.ky.gov/Case/ViewCaseFilings/2020-00349/Public); LG&E: Case No. 2020-00350, Public Comments (https://psc.ky.gov/Case/ViewCaseFilings/2020-00350/Public).

<sup>&</sup>lt;sup>15</sup> Mullane v. Cent. Hanover Bank & Trust Co., 339 U.S. 306, 314-315 (1950) ("The notice must be of such nature as reasonably to convey the required information, and it must afford a reasonable time for those interested to make their appearance. But if with due regard for the practicalities and peculiarities of the case these conditions are reasonably met, the constitutional requirements are satisfied. . . . The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness, and hence the constitutional validity of, any chosen method may be defended on the ground that it is, in itself, reasonably certain to inform those affected, or, where conditions do not reasonably permit such notice, that the form chosen is not substantially less likely to bring home notice than other of the feasible and customary substitutes.") (citations omitted).

<sup>&</sup>lt;sup>16</sup> Exhibit A shows forms for both Companies.

Companies, language directing interested parties to the addresses and contact information of the Companies and the Commission, and a hyperlink for the Companies' website where customers may view the full Section 17(4) notice and a complete redlined copy of each of the Companies' proposed revisions to their Kentucky retail service tariffs at issue in these proceedings.

8. In addition to the publication of this form of notice, the Companies will take the following actions to ensure public awareness of the proposed rate adjustments:

- a. At the time the newspapers begin to publish the legal notice, the Companies would make a complete copy of the more detailed and lengthy notice that Section 17(4) requires available upon request. The Companies plan to make the Section 17(4) notice available to requesting customers via mail or email;
- b. In light of the fact that the Companies' business offices in Louisville and Lexington are not open to the public,<sup>17</sup> the Companies would not post the customer notice at those offices as required by 807 KAR 5:001, Section 17(1)(a) and 807 KAR 5:011, Section 8(1)(a) and the Companies seek the Commission's approval not to do so. If that is not suitable to the Commission, then at the time the newspapers begin to publish the legal notice, each of the Companies would post the abbreviated notice on the publicly visible outside doors of its office and hyperlink to its full Section 17 Notice and, when filed, the location on the Commission's website where case documents and tariff filings will be available;<sup>18</sup>

<sup>&</sup>lt;sup>17</sup> For KU, One Quality Street, Lexington, Kentucky 40507. For LG&E, 820 W. Broadway, Louisville, Kentucky 40202.

<sup>&</sup>lt;sup>18</sup> The Commission approved a similar proposal by Kentucky Power Company last year. See Request for Deviation by Kentucky Power Company from the Requirements of 807 KAR 5:006, Section 13(1)(c), Regarding Posting of Customer Bill of Rights, Case No. 2007-00191, Order (Ky. PSC Nov. 27, 2024).

- c. At the time of publication of the abbreviated notice, each of the Companies would post on its website a copy of the more detailed and lengthy notice that Section 17 requires and a hyperlink to the location on the Commission's website where case documents and tariff filings are available;
- d. Beginning on May 30, 2025, each of the Companies would include a bill insert in the form of Exhibit B<sup>19</sup> hereto that would be sent to all Kentucky retail customers during the course of their regular billing cycle which shows the requested annual increase in dollars and percentages and the effect on the average monthly bill in dollars and percentages for all rate classes and which includes a hyperlink to a Section 17 compliant notice;
- e. At the time of the filing of its application, each of the Companies would notify via email each entity that had been granted intervention or otherwise permitted to participate in its last general rate case proceeding of the filing of the applications and provide a hyperlink to the location on the Commission's website where case documents and tariff filings are available;
- f. At the time the newspapers begin to publish the legal notice, the Companies would issue press advisories to all known news media organizations who cover the areas within their certified territory advising of the filing of their applications and include a hyperlink to the location on the Companies' and the Commission's websites where case documents and tariff filings will be available. The hyperlink to the Companies' website will contain the same notice being published by the newspapers until the date the applications are

<sup>&</sup>lt;sup>19</sup> Exhibit B shows forms for both Companies.

filed. On the date the applications are filed, the Companies' website will be updated to contain the complete public version of the applications filed with the Commission; and

g. At the time of the filing of its application, the Companies will include the full Section 17 notice in the filing as a separate document, labeled "Customer Notice of Rate Adjustment," to enable customers accessing the Commission's website to easily locate the notice.

9. Use of the proposed abbreviated notice in lieu of the more lengthy and detailed notice required by Section 17(4) will likely result in a significant savings to the Companies' customers of approximately \$6.6 million.<sup>20</sup> The Companies have received publication cost estimates from the Kentucky Press Association comparing the publication costs of the forms attached as Exhibit A (the abbreviated notices) to the costs of publishing full Section 17(4) notices. Publishing the Exhibit A forms is expected to cost approximately \$100,000. Publishing the full Section 17(4) notices is expected to cost approximately \$6.7 million.

10. Based on the public comment records of its 2020 rate cases,<sup>21</sup> the Companies do not believe that use of the proposed abbreviated notice will reduce customer awareness of the proposed rate adjustment or customer participation in the rate proceedings.

11. Section 22 and Section 17(5) of the Commission's Rules of Procedure authorize the Commission to permit deviations from those rules for good cause.<sup>22</sup> In light of the significant savings to customers through the use of the proposed abbreviated notice without any significant reduction in public awareness of the proposed rate adjustments, good cause exists for the

<sup>&</sup>lt;sup>20</sup> As with its previous rate cases, the Companies will prepare to provide the actual total costs of publication for its 2025 Rate Cases when these figures become available.

<sup>&</sup>lt;sup>21</sup> Case Nos. 2020-00349, 2020-00350, Public Comments, note 14, *supra*.

<sup>&</sup>lt;sup>22</sup> 807 KAR 5:001 Section 22; Section 17(5).

Commission to authorize a deviation from Section 17 of its Rules of Procedure and permit the Companies to publish the proposed abbreviated form of notice in lieu of the notice required by Section 17(4).

#### **Incorporation of Certain Federal Filings into the Record via Reference**

12. With their filing of formal notice of intent to file an application for general rate adjustment, the Companies have also filed, pursuant to Section 8 of the Commission's Rules of Procedure, notice of their election to use electronic filing procedures.<sup>23</sup>

13. Section 8 of the Commission's Rules of Procedure provides that, in any proceeding in which an applicant has timely elected the use of electronic filing procedures, those electronic filing procedures will be followed. The electronic filing procedures of 807 KAR 5:001 Section 8 require a party submitting a paper to the Commission to file an electronic copy through the Commission's Electronic Filing System and to physically deliver to the Commission's offices a copy in paper medium,<sup>24</sup> but the Commission issued a permanent deviation to that paper requirement on July 22, 2021.<sup>25</sup>

14. Section 16 of the Commission's Rules of Procedure allows utilities to request a waiver from any of the filing requirements for a general rate adjustment, which may be granted for good cause.<sup>26</sup>

<sup>&</sup>lt;sup>23</sup> 807 KAR 5:001 Section 8(1)

<sup>&</sup>lt;sup>24</sup> 807 KAR 5:001 Section 8(3); 807 KAR 5:001, Section 1(9) defines a "paper" as an application, petition, or other initiating document, motion, complaint, answer, response, reply, notice, request for information, or other document that . . . [807 KAR 5:001] or the commission directs or permits a party to file in a case."

<sup>&</sup>lt;sup>25</sup> Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, Case No. 2020-00085, Order at 4 (Ky. PSC July 22, 2021) ("The Commission further finds that utilities should continue to utilize electronic filing procedures found in 807 KAR 5:001, Section 8, except that parties to any electronic case should be granted a permanent deviation from the filing requirement in that section that requires a paper copy be filed with the Commission or other parties to that case.").

<sup>&</sup>lt;sup>26</sup> 807 KAR 5:001 Section 16(10).

15. In determining good cause, the Commission may consider whether "the information that the utility would provide if the waiver is granted is sufficient to allow the commission to effectively and efficiently review the rate application" and "the expense to the utility in providing the information that is subject of the waiver request."<sup>27</sup>

16. The Commission has made clear that waivers and deviations of Section 16 filing requirements are limited solely to meeting the Commission's filing requirements, and that the utility still bears the burden of providing whatever information is necessary to support its proposed rate adjustment.<sup>28</sup>

17. As discussed further below, the Companies request leave to omit from their applications for general rate adjustment the following documents that 807 KAR 5:001 requires to be included in those applications, though the Companies propose to provide hyperlinks to where the Federal Energy Regulatory Commission ("FERC") or the U.S. Securities and Exchange Commission ("SEC") permanently maintain these records on their public websites:<sup>29</sup>

- a. Most recent FERC audit report;<sup>30</sup>
- b. Most recent FERC Form 1 (electric);<sup>31</sup> and
- SEC's annual report (Form 10-K) for the most recent two years, any Form 8-Ks issued in the last two years, and any Form 10-Q issued during the past six quarters.<sup>32</sup>

<sup>&</sup>lt;sup>27</sup> 807 KAR 5:001 Section 16(10)(a), (c).

<sup>&</sup>lt;sup>28</sup> See Electronic Application of Bluegrass Water Utility Operating Company for an Adjustment of Sewage Rates, Case No. 2022-00432, Order (Apr. 14, 2023) (partially waiving Section 16 filing requirements and approving deviations).
<sup>29</sup> SEC filings are available through the agency's "EDGAR" system, at https://www.sec.gov/edgar/search/. FERC filings are available through the agency's eLibrary system, at <u>https://elibrary.ferc.gov/eLibrary/search</u>. Both SEC and FERC are required to safeguard their record-keeping systems and prevent removal or loss of their electronic records.
44 U.S.C 3105. Also, pursuant to 36 CFR 1236.10-.12, they must budget and plan for system transitions to maintain the integrity of their electronic records.

<sup>&</sup>lt;sup>30</sup> 807 KAR 5:001 Section 16(7)(i).

<sup>&</sup>lt;sup>31</sup> 807 KAR 5:001 Section 16(7)(k).

<sup>&</sup>lt;sup>32</sup> 807 KAR 5:001 Section 16(7)(p).

18. Given the availability of these documents on public databases and the inefficiencies created by re-uploading these voluminous documents into the record of this case, the Companies request that the Commission grant a partial waiver of the requirements of Section 16(7) and allow the Companies to incorporate these documents into the record by reference, and facilitate easy access to these records by including hyperlinks to the SEC and FERC databases containing these documents.

19. The proposed partial waiver will allow the Commission, the Companies, and any intervenors to navigate the record of the case more efficiently, and without the need to download thousands of pages. For this reason, the SEC has authorized parties to incorporate its previous SEC filings into the record of current filings and has promulgated rules to standardize the incorporation by reference process.<sup>33</sup>

20. The Companies believe that by using similar rules to those promulgated by the SEC, it will be able to give the Commission, Intervenors, and interested customers access to these public documents in an easily navigable form.

21. In keeping with Commission precedent, the Companies recognize that this partial waiver is limited solely to filing requirements. If the Companies rely on the information in these documents to support their proposed rate adjustments, they will provide hyperlinks and specific location information for the relevant portions of these documents.

<sup>&</sup>lt;sup>33</sup> 17 CFR § 240.12b-23(c) ("Any document or part thereof filed with the Commission pursuant to any Act administered by the Commission may be incorporated by reference as an exhibit to any statement or report filed with the Commission by the same or any other person. Any document or part thereof filed with an exchange pursuant to the Act may be incorporated by reference as an exhibit to any statement or report filed with the exchange by the same or any other person. If any modification has occurred in the text of any document incorporated by reference since the filing thereof, the registrant must file with the reference a statement containing the text of any such modification and the date thereof.").

22. The Commission has previously incorporated by reference findings of fact and documents from other administrative agencies.<sup>34</sup>

#### **Conclusion**

23. The Companies' request for the use of abbreviated notice is intended to reduce the costs of the upcoming rate proceedings to provide significant savings to customers, and the Companies' request for partial waiver and incorporation of certain documents by reference and hyperlink is intended to achieve efficiencies and reduce the burden to the Companies and the Commission related to the uploading and handling of unwieldy documents that already exist on federal administrative databases.

**WHEREFORE,** Kentucky Utilities Company and Louisville Gas and Electric Company respectfully request the Commission enter an order no later than May 2, 2025:

1. Authorizing the Companies to publish, in conjunction with the other notices and actions described above, an abbreviated notice of their proposed rate adjustment in the form set forth in Exhibit A to this Motion as permitted pursuant to 807 KAR 5:001, Section 17(5);

2. Authorizing the Companies to deviate from 807 KAR 5:001, Section 17(1)(a) and 807 KAR 5:011, Section 8(1)(a) by not posting the customer notice at its place of business;

3. Authorizing the Companies to deviate from 807 KAR 5:001, Section 8(12) and, pursuant to 807 KAR 5:001 Section 16(10), partially waiving Section 16 filing requirements to allow the Companies to submit into the record via hyperlink the following documents:

a. Most recent FERC audit report;

<sup>&</sup>lt;sup>34</sup> Complaint of Sprint Communications Company L.P. Against Bluegrass Telephone Company, Inc. D/B/A/ Kentucky Telephone Company for the Unlawful Imposition of Access Charges, Case No. 2010-00012 Order (Ky. PSC Jan. 22, 2010) (Incorporating by reference findings of fact in an FCC Memorandum Opinion and Order); *Kentucky West* Virginia Gas Company Application for a Determination Pursuant to the Natural Gas Policy Act of 1978, Case No. 8742. Order (Feb. 10, 1983) (Incorporating by reference the full record of the Kentucky Department of Mines and Minerals regarding the same applicant).

- b. Most recent FERC Form 1 (electric); and
- c. SEC's annual report (Form 10-K) for the most recent two years, any Form 8-Ks issued in the last two years, and any Form 10-Q issued during the past six quarters; and
- 4. All other appropriate relief.

Respectfully submitted,

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Counsel for Kentucky Utilities Company and Louisville Gas and Electric Company

# NOTICE TO CUSTOMERS OF KENTUCKY UTILITIES COMPANY

**PLEASE TAKE NOTICE** that, in a May 30, 2025 Application, Kentucky Utilities Company ("KU") is seeking approval by the Kentucky Public Service Commission of an adjustment of its rates and charges to become effective on and after July 1, 2025.

The proposed rates and charges reflect a proposed annual increase in revenues of approximately XX% to KU.

The monthly residential electric bill increase due to the proposed electric base rates will be XX percent, or approximately \$X.XX, for a customer using X,XXX kWh of electricity (the average monthly consumption of a KU residential electric customer). Proposed base rate increases to customers other than residential are described in the Notice of Filing referenced below.

KU also is proposing changes in the text of some of its rate schedules and other tariff provisions, including its terms and conditions for electric service. Complete copies of the proposed tariffs containing the proposed text changes and rates may be obtained by contacting Kentucky Utilities Company by mail at 2701 Eastpoint Parkway, Louisville, Kentucky 40223; by phone at 800-981-0600; or by visiting KU's website at lge-ku.com.

Comments regarding the application may be submitted to the Public Service Commission by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 or by email to psc.info@ky.gov. All comments should reference Case No. 2025-00113.

The rates contained in this notice are the rates proposed by KU, but the Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice. A person may submit a timely written request for intervention to the Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 establishing the grounds for the request including the status and interest of the party. If the Commission does not receive a written request for intervention within thirty (30) days of initial publication or mailing of this notice, the Commission may take final action on the application.

A copy of the Notice of Filing and the proposed tariff, once filed, also shall be available for public inspection on KU's website at <u>lge-ku.com</u>, or through the Public Service Commission's website at http://psc.ky.gov.

Kentucky Utilities Company c/o LG&E and KU Energy LLC 2701 Eastpoint Parkway P. O. Box 32010 Louisville, Kentucky 40232 800-981-0600

# NOTICE TO CUSTOMERS OF LOUISVILLE GAS AND ELECTRIC COMPANY

**PLEASE TAKE NOTICE** that, in a May 30, 2025 Application, Louisville Gas and Electric Company ("LG&E") is seeking approval by the Kentucky Public Service Commission of an adjustment of its electric and gas rates and charges to become effective on and after July 1, 2025.

The proposed rates and charges reflect a proposed annual increase in electric revenues of approximately XX% and gas revenues of approximately XX% to LG&E.

The monthly residential electric bill increase due to the proposed electric base rates will be XX percent, or approximately \$X.XX, for a customer using X,XXX kWh of electricity (the average monthly consumption of an LG&E residential electric customer). Proposed base rate increases to customers other than residential are described in the Notice of Filing referenced below.

The monthly residential gas bill increase due to the proposed gas base rates will be XX percent, or approximately \$X.XX, for a customer using XX ccf of gas (the average monthly consumption of an LG&E residential gas customer). Proposed base rate increases to customers other than residential are described in the Notice of Filing referenced below.

LG&E also is proposing changes in the text of some of its rate schedules and other tariff provisions, including its terms and conditions for electric or gas service. Complete copies of the proposed tariffs containing the proposed text changes and rates may be obtained by visiting LG&E's website at lge-ku.com.

Comments regarding the application may be submitted to the Public Service Commission by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 or by email to psc.info@ky.gov. All comments should reference Case No. 2025-00114.

The rates contained in this notice are the rates proposed by LG&E, but the Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice. A person may submit a timely written request for intervention to the Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 establishing the grounds for the request including the status and interest of the party. If the Commission does not receive a written request for intervention within thirty (30) days of initial publication or mailing of this notice, the Commission may take final action on the application.

A copy of the Notice of Filing and the proposed tariff, once filed, also shall be available for public inspection on LG&E's website at lge-ku.com or through the Public Service Commission's website at http://psc.ky.gov.

Louisville Gas and Electric Company 2701 Eastpoint Parkway P. O. Box 32010 Louisville, Kentucky 40232 502-589-1444 or 800-331-7370

# NOTICE TO CUSTOMERS OF KENTUCKY UTILITIES COMPANY

**PLEASE TAKE NOTICE** that, in a May 30, 2025 Application, Kentucky Utilities Company ("KU") is seeking approval by the Kentucky Public Service Commission of an adjustment of its rates and charges to become effective on and after July 1, 2025.

The proposed rates and charges reflect a proposed annual increase in revenues of approximately XX% to KU.

The estimated amount of the annual change and the average monthly bill to which the proposed electric rates and charges will apply for each electric rate class are as follows:

Electric Rate Class	Average Usage (kWh)	Annual \$ Increase	Annual % Increase	Monthly Bill \$ Increase	Monthly Bill % Increase
Residential					
Residential Time-of-Day					
General Service					
General Time-of-Day					
All Electric School					
Power Service					
Time-of-Day Secondary					
Time-of-Day Primary					
Retail Transmission					
Extremely High Load Factor					
Fluctuating Load Service					
Outdoor Lights					
Lighting Energy					
Traffic Energy					
PSA					
Outdoor Sports Lighting					
Rider – CSR					

KU also is proposing changes in the text of some of its rate schedules and other tariff provisions, including its terms and conditions for electric service. Complete copies of the proposed tariffs containing the proposed text changes and rates may be obtained by contacting Kentucky Utilities Company by mail at 2701 Eastpoint Parkway, Louisville, Kentucky 40223; by phone at 800-981-0600; or by visiting KU's website at lge-ku.com.

The application also may be examined at KU's website at lge-ku.com. A person also may examine this application at the Public Service Commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8 a.m. to 4:30 p.m. or through the Commission's website at http://psc.ky.gov.

Comments regarding the application may be submitted to the Public Service Commission by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 or by email to psc.info@ky.gov. All comments should reference Case No. 2025-00113.

# Exhibit B Page 2 of 4

The rates contained in this notice are the rates proposed by KU, but the Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice. A person may submit a timely written request for intervention to the Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 establishing the grounds for the request including the status and interest of the party. If the Commission does not receive a written request for intervention within thirty (30) days of initial publication or mailing of this notice, the Commission may take final action on the application.

A copy of the Notice of Filing and the proposed tariff, once filed, also shall be available for public inspection on KU's website at <u>lge-ku.com</u>, or through the Public Service Commission's website at http://psc.ky.gov.

Kentucky Utilities Company c/o LG&E and KU Energy LLC 2701 Eastpoint Parkway P. O. Box 32010 Louisville, Kentucky 40232 800-981-0600

# NOTICE TO CUSTOMERS OF LOUISVILLE GAS AND ELECTRIC COMPANY

**PLEASE TAKE NOTICE** that, in a May 30, 2025 Application, Louisville Gas and Electric Company ("LG&E") is seeking approval by the Kentucky Public Service Commission of an adjustment of its electric and gas rates and charges to become effective on and after July 1, 2025.

The proposed rates and charges reflect a proposed annual increase in electric revenues of approximately XX% and gas revenues of approximately XX% to LG&E.

The estimated amount of the annual change and the average monthly bill to which the proposed electric rates and charges will apply for each electric rate class are as follows:

	Average	Annual	Annual	Monthly	Monthly
Electric	Usage	\$	%	Bill \$	Bill %
Rate Class	(kWh)	Increase	Increase	Increase	Increase
Residential					
Residential Time-of-Day					
General Service					
General Time-of-Day					
Power Service					
Time-of-Day Secondary					
Time-of-Day Primary					
Retail Transmission					
Extremely High Load					
Factor					
Fluctuating Load					
Outdoor Lights					
Lighting Energy					
Traffic Energy					
PSA					
Outdoor Sports Lighting					
Rider – CSR					

The estimated amount of the annual change and the average monthly bill to which the proposed gas rates and charges will apply for each gas rate class is as follows:

Gas Rate Class	Average Usage (Mcf)	Annual \$ Increase	Annual % Increase	Monthly Bill \$ Increase	Monthly Bill % Increase
Residential					
Commercial					
Industrial					
As-Available					
Firm Transportation					
Distributed Generation					
Substitute Gas Sales					
Local Gas Delivery					

LG&E also is proposing changes in the text of some of its rate schedules and other tariff provisions, including its terms and conditions for electric or gas service. Complete copies of the proposed tariffs containing the proposed text changes and rates may be obtained by contacting Louisville Gas and Electric Company by mail at 2701 Eastpoint Parkway, Louisville, Kentucky, 40223; by phone at 502-589-1444 or 800-331-7370; or by visiting LG&E's website at lge-ku.com.

The application also may be examined at LG&E's website at lge-ku.com. A person also may examine this application at the Public Service Commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8 a.m. to 4:30 p.m., or through the Commission's website at http://psc.ky.gov.

Comments regarding the application may be submitted to the Public Service Commission by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 or by email to psc.info@ky.gov. All comments should reference Case No. 2025-00114.

The rates contained in this notice are the rates proposed by LG&E, but the Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice. A person may submit a timely written request for intervention to the Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602 establishing the grounds for the request including the status and interest of the party. If the Commission does not receive a written request for intervention within thirty (30) days of initial publication or mailing of this notice, the Commission may take final action on the application.

A copy of the Notice of Filing and the proposed tariff, once filed, also shall be available for public inspection on LG&E's website at lge-ku.com or through the Public Service Commission's website at http://psc.ky.gov.

Louisville Gas and Electric Company 2701 Eastpoint Parkway P. O. Box 32010 Louisville, Kentucky 40232 502-589-1444 or 800-331-7370