

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) CASE NO. 2025-00113
REGULATORY AND ACCOUNTING)
TREATMENTS)

In the Matter of:

ELECTRONIC APPLICATION OF)
LOUISVILLE GAS AND ELECTRIC)
COMPANY FOR AN ADJUSTMENT OF ITS)
ELECTRIC AND GAS RATES, AND) CASE NO. 2025-00114
APPROVAL OF CERTAIN REGULATORY)
AND ACCOUNTING TREATMENTS)

RENEWED MOTION FOR DEVIATION

Pursuant to 807 KAR 5:001, Section 5 and Section 17(5), 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. The Companies make this Renewed Motion 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 Renewed Motion, the Companies respectfully state:

1. On April 7, 2025, the Companies filed a Motion to Deviate seeking approval to publish an abbreviated customer notice, relief from the requirement to post customer notice at their

places of business, and relief from having to file certain SEC and FERC documentation. The Companies attached to that motion the proposed abbreviated notices for each company as Exhibit A and proposed bill inserts for each company as Exhibit B.

2. On April 21, 2025, the Commission issued an Order denying the April 7, 2025 Motion to Deviate. The Commission stated that “review of the full notice is necessary in order to determine whether the abbreviated notice meets all of the requirements.”¹ As to the proposed abbreviated notices that were attached as Exhibit A to the April 7, 2025 motion, the Commission stated that it “encourages LG&E/KU to follow more closely the notice format approved in Case Nos. 2020-00349 and 2020-00350,”² which were the most recent rate cases for the Companies. Those approved abbreviated notices included more content regarding the proposed rate changes and the effects thereof and more specific descriptions of proposed tariff changes. The Commission stated that an abbreviated notice should include a direct URL to the full notice and the most recent quarterly changes to gas rates. The Commission also stated that it agrees with the Companies that the cost of publishing a full notice may exceed the benefits of publishing it. Finally, the Commission granted the Companies leave to refile a motion that reflects the Commission’s instructions. Thus, the Companies hereby file this Renewed Motion.³

3. So the Commission can review full notices, attached as Exhibit A are such preliminary full notices for LG&E and KU as required by 807 KAR 5:001, Section 17(4).⁴ These represent the full notices that will be made available on the Companies’ website as noted in Paragraph 5(c) below.

¹ April 21, 2025 Order at 9.

² *Id.*

³ The Companies are not renewing their request for relief from the requirement to post customer notice at their places of business nor from filing certain SEC and FERC documentation.

⁴ The preliminary full notices are confidential and are therefore being submitted pursuant to a Petition for Confidential Treatment.

4. Consistent with the Commission’s encouragement, the Companies have attached as Exhibit B proposed abbreviated notices for LG&E and KU that more closely resemble the abbreviated notices the Commission approved in the Companies’ most recent rate cases.⁵ Because they have more content and are longer, it will be more expensive to publish them compared to the cost of publishing the abbreviated notices the Companies attached to their April 7, 2025 Motion. As set forth in that motion, the estimated cost of publishing these notices is only approximately \$100,000. The estimated cost of publishing the abbreviated notices attached hereto as Exhibit B will be approximately \$800,000. Of course, under either set of proposed abbreviated notices, a customer would be provided a URL that directs them to the full notice.

5. In addition to the publication of the proposed abbreviated notices attached hereto, 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 abbreviated notice, the Companies would make a complete copy of the full Section 17(4) notice available upon request. The Companies plan to make the Section 17(4) notice available to requesting customers via mail or email;
- b. At the time the newspapers begin to publish the abbreviated notice, each of the Companies would post the abbreviated notice on the publicly visible outside doors of its offices in Lexington and Louisville⁶ and hyperlink to its full Section

⁵ The proposed abbreviated notice for LG&E has the most current gas supply clause rates approved on April 23, 2025 to be effective May 1, 2025.

⁶ For KU, the posting will be made at One Quality Street in Lexington and for LG&E, the posting will be made at 2701 Eastpoint Parkway in Louisville.

17(4) notice and, when filed, the location on the Commission’s website where case documents and tariff filings will be available;⁷

- c. At the time of publication of the abbreviated notice, each of the Companies would post on its website a copy of the full notice that Section 17(4) requires and a hyperlink to the location on the Commission’s website where case documents and tariff filings are available;
- d. Beginning with the first billing cycle after filing the Applications on May 30, 2025, each of the Companies would include a bill insert in the form of Exhibit C⁸ hereto that would be sent to all Kentucky retail customers during the course of their regular billing cycle. That bill insert 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(4) full notice;
- e. At the time of the filing of their Applications, 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) that the Companies had filed the Applications and provide a hyperlink to the location on the Commission’s website where case documents and tariff filings are available;
- f. Prior to the time the newspapers begin to publish the abbreviated 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

⁷ 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).

⁸ Exhibit C shows forms for both Companies.

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 abbreviated notice being published by the newspapers until the date the Applications are 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 their Applications, the Companies will include the full Section 17(4) 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 full notice.

6. Publication of the proposed abbreviated notices attached hereto in lieu of the full notice required by Section 17(4) will result in significant avoided costs to the Companies' customers.⁹

7. Based on the public comment records of its 2020 rate cases,¹⁰ 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.

8. 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.¹¹ 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

⁹ As with its previous rate cases, the Companies will provide the actual total costs of publication for its 2025 Rate Cases when these figures become available.

¹⁰ Case Nos. 2020-00349, 2020-00350, Public Comments.

¹¹ 807 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).

9. The Companies respectfully request the Commission enter an order no later than May 5, 2025, so the Companies can submit their publication requests to Kentucky Press Service in time to meet publication deadlines.

WHEREFORE, Kentucky Utilities Company and Louisville Gas and Electric Company respectfully request the Commission enter an order no later than May 5, 2025:

1. Authorizing the Companies to publish, in conjunction with the other notices and actions described above, abbreviated notices of their proposed rate adjustments in the forms set forth in Exhibit B to this Renewed Motion as permitted pursuant to 807 KAR 5:001, Section 17(5); and
2. All other appropriate relief.

Dated: April 29, 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 April 29, 2025; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



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4927-9098-1946.1