

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT’S
MOTION TO INTERVENE**

Louisville/Jefferson County Metro Government (“Louisville Metro”), by counsel, hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 4(11) for intervention in the above-styled matter. In support of its motion, Louisville Metro states the following:

Louisville Metro is a consolidated local government established under KRS Chapter 67C. Its address is 527 W. Jefferson Street, Louisville, KY 40202.

The Commission has interpreted KRS 278.040(2) as requiring a person seeking intervention to have an interest in the rates or service of a utility as those are the only matters that are subject to the Commission's jurisdiction. *See Order, Kentucky Power Co.*, Case No. 2017-00179 (Ky. PSC June 19, 2017). Louisville Metro satisfies this requirement because it is a customer of Louisville Gas & Electric (“LG&E”). Each fiscal year, Louisville Metro pays approximately millions of dollars to LG&E for electrical and gas service.

Administrative regulation 807 KAR 5:001, Section 4(11)(b) states:

The commission shall grant a person leave to intervene if the commission finds that he or she has made a timely motion for

intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.

Louisville Metro meets both these criteria. Louisville Metro has special interests in LG&E's rate case that will not otherwise be adequately represented. First and foremost, as one of LG&E's largest customers that take service from a variety of rate classifications, no other party could adequately represent the interests of Louisville Metro. Second, and relatedly, Louisville Metro is LG&E's largest customer of Outdoor Lighting classification. Each year, Louisville Metro pays approximately millions of dollars to LG&E for outdoor-lighting and traffic rate codes. Ultimately, no other party could adequately represent the special interests of Louisville Metro, whether those interests related to lighting, changes impacting governmental agencies related to pole attachments, or other issues affecting Louisville Metro.

Louisville Metro is also likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. In this particular case, Louisville Metro anticipates addressing issues and developing facts on the following additional issues: lighting, including the rates and conversion to LED lighting; increase in Basic Service Charge; various elements of revenue requirements; and net metering. Louisville Metro desires to play a constructive role in this matter and isolate issues that are most important to it. Louisville Metro's focus will serve to neither unduly complicate nor disrupt the proceeding. Louisville Metro believes that its prior involvement in other cases before the Commission demonstrates its productive standing in the process.¹

¹ In addition to granting intervention to Louisville Metro and Lexington-Fayette Urban County Government in LG&E's and KU's past rate cases, the Commission has determined that at least one other City met the above-mentioned criteria in an investor-owned utility's rate case. *See Water Service Corp. of Kentucky*, Case No. 2020-00160 (granting intervention to the City of Clinton).

Attorneys for Louisville Metro listed below possess the facilities to receive electronic transmission of all notices and messages related to this proceeding at the electronic mailing addresses listed below. All correspondence to Louisville Metro should be sent to the attorneys' addresses or email addresses listed below.

Accordingly, because Louisville Metro has a special interest in this case that is not otherwise adequately represented and because it 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, Louisville Metro respectfully requests intervention in this proceeding.

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC



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