

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NUCLEAR)	CASE No.
ENERGY, GENERATION, STORAGE, AND)	2025-00186
RELATED MATTERS)	

**LOUISVILLE CLIMATE ACTION NETWORK, INC.
MOTION TO INTERVENE**

Comes now the Louisville Climate Action Network, Inc. (LCAN), by and through counsel, and moves for leave to intervene into the instant case. In support of its motion to intervene, LCAN states the following.

1. LCAN is a non-profit corporation organized in Kentucky with a principal office in Louisville. LCAN is in good standing with the Kentucky Secretary of State.
2. LCAN's mailing address, electronic mail address, and other contact information:

Louisville Climate Action Network, Inc.
ATTN: Sarah Lynn Cunningham
P.O. Box 4594
Louisville, Kentucky 40204
(502) 451-2665
info@louisvillecan.org

3. LCAN's mission is to (1) provide technical energy efficiency and renewable energy services to nonprofit organizations so they may "spend less on utilities, more on mission," (2) deliver climate-action education through its website, newsletters, videos, classes, and workshops, and (3) advocate for public policies that reduce carbon pollution and lower costs.

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. LCAN has a special interest in this proceeding that is not otherwise adequately represented. Its members are directly affected by Commission policies governing energy generation, including the development of nuclear facilities. As a Kentucky-based nonprofit, LCAN provides technical energy efficiency and renewable energy services to other nonprofit institutions, delivers climate-action education through a variety of programs, and advocates for public policies that reduce carbon pollution and lower costs. These activities place the organization and its members squarely at the intersection of the issues under investigation. In particular, LCAN represents constituencies that may be disproportionately impacted by the costs, risks, and siting decisions associated with nuclear generation. Such impacts include the potential for higher utility expenses, environmental and safety concerns, and inequitable burdens on low-income or underserved communities.
6. If granted intervention, LCAN will present issues and develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. In particular, LCAN will offer perspectives on the economic, environmental, and regulatory implications of nuclear energy development, as well as the equity and community impacts that such projects may create. By bringing its experience in energy efficiency, renewable energy, and climate policy to bear, LCAN will ensure that the

¹ Order (Ky. P.S.C. Aug. 1, 2025), pages 2 and 3 (citing 807 KAR 5:001, Section 4(11)(a)).

Commission has the benefit of a broader range of considerations than would otherwise be available through the participation of utilities or individual ratepayers.

7. LCAN 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. LCAN 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 LCAN.
8. LCAN's motion to intervene is timely filed.

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

Respectfully submitted,

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Counsel for LCAN

NOTICE AND CERTIFICATION CONCERNING SERVICE

Undersigned counsel provides notice 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 5th day of September, 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. No party to this proceeding has been excused from the electronic filing procedures.

(x) David E. Spenard
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