

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC MONITORING OF LOUISVILLE)	CASE NO.
GAS AND ELECTRIC COMPANY AND KENTUCKY)	2025-000313
UTILITY COMPANY'S MILL CREEK UNIT 6)	

**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) and the Commission's December 4, 2005 Order in the instant proceeding, moves for leave to intervene into the instant proceeding. In support of its motion to intervene, SREA states the following.

1. SREA was granted intervention in Case No. 2025-00045.¹
2. SREA is a nonprofit corporation, with no shares of stock, incorporated under and in good standing with the laws of the State of Arkansas.
3. SREA's full name, mailing address, electronic mail address, and website address:

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¹ Case No. 2025-00045, *Electronic Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates*, Order (Mar. 31. 2025).

4. 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, development, and forecasting in dockets concerning the integrated resource planning and subsequent resource procurement efforts of electric utilities.
5. The December 4, 2025 Order requires all parties granted intervention in Case No. 2025-00045 to be served with a copy of the December 4, 2025 Order in the instant case.² The Order also requires, “Within 30 days after receipt of the Order, any party granted intervention in Case No. 2025-00045 wishing to intervene in this case, should file notice of representation and indicate that they wish to be a party to this monitoring case to facilitate notice of filings and in-person meetings.”³
6. SREA wishes to be a party to this monitoring case and is represented by the counsel listed below.
7. SREA is also entitled to permissive intervention. The December 4, 2025 Order 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

² Order (Ky. P.S.C. Dec. 4, 2025), page 4.

³ *Id.*

present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.”⁴

8. SREA has a special interest in this monitoring proceeding which is not otherwise adequately represented by any party in this case. As noted above and in Case No. 2025-00045, 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.
9. 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 development, availability, pricing, performance, and forecasting. SREA’s intent is to enable this docket to accurately and adequately evaluate and monitor the construction, economic development, and load forecasting pertinent to the instant case.

⁴ Order (Ky. P.S.C. Dec. 4, 2025), page 6 (citing 807 KAR 5:001, Section 4(11)(a)).

10. SREA has, in addition to Case No. 2025-00045, 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.⁵
11. 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.
12. 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).
13. SREA will present issues and develop facts that will assist the Commission in fully considering the monitoring issues without unduly complicating or disrupting the proceedings. The direct linkage of the issues and facts in the instant case with the

⁵ 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).

issues and facts of the Companies' 2025 CPCN application in Case No. 2025-00045 is clearly established through the Commission's December 4, 2025 Opening Order.

14. 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/ David E. Spenard

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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 5th day of December 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/ David E. Spenard