

Commonwealth of Virginia

**STATE CORPORATION COMMISSION
DIVISION OF PUBLIC UTILITY REGULATION**

MEMORANDUM

Date: 8/7/2026

To: Document Control

From: Michelle Brown-White, Division of Public Utility Regulation

RE: Kentucky Utilities Company d/b/a Old Dominion Power Company &
Louisville Gas & Electric Company - For Transfer of Certificate, Approval of
Merger, & Declaratory Order

Attached is a comment submitted to the Commission for consideration.
Please enter in the case jacket for Case No. **PUR-2026-00052**.

Thank you.

Brandon Trahan

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From: noreply@scc.virginia.gov
To: [PUR Comments](#)
Subject: Confirmation of your form submission
Date: Thursday, August 6, 2026 9:00:56 PM

Below is a copy of the information you sent to us.

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Comments	KU and LG&E together serve around 1.4 million people. Merging them makes Virginia's ODP customers less than two percent of a Kentucky company answering mainly to Kentucky regulators. That's a small territory with almost no leverage, in one of the poorest parts of the state, getting smaller. The companies talk about efficiencies. I haven't seen a number they've committed to putting on anyone's bill. If the savings are real, let them be binding. If they won't commit, the Commission shouldn't count them as a public benefit. The risks are more concrete. Combining an electric utility with a gas utility muddies who pays for what, and Virginia customers shouldn't end up covering Louisville's gas system or generation built for Kentucky data center load. Merger legal and consulting costs shouldn't land in Virginia rates. And when KU's separate books disappear, it gets harder for Commission Staff

and Consumer Counsel to check the math on what Virginians are charged. That's steep, rural country with old lines. Consolidation usually means fewer crews nearby and longer waits after a storm. The burden is on the applicants to show this serves Virginia. They haven't.

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