

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC INVESTIGATION INTO THE
AFFORDABILITY OF ELECTRIC AND
NATURAL GAS UTILITY SERVICE AND
RELATED MATTERS**

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) **Case No. 2026-00185**
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SIERRA CLUB’S INITIAL COMMENTS

Sierra Club appreciates the opportunity to submit these Initial Comments pursuant to the Commission’s August 26, 2026 Order in this docket. As set out in the Commission’s Order, this docket aims to help the Commission, “better understand the factors affecting affordability across the Commonwealth and to evaluate existing and potential approaches for addressing those concerns.”¹ The Order states that the parties’ Initial Comments should “identify[] the issues they believe should be examined” and include “a short list of topics” that should be addressed in a subsequent stakeholder process.²

As an initial matter, Sierra Club urges the Commission to engage residential ratepayers from all parts of Kentucky. Although utilities will be able to provide useful, anonymized quantitative data points for statewide comparison, such as average residential monthly bills within a specific geographic area, the Commission should seek out and listen to residential ratepayers in order to better understand their concerns with rising electric and gas rates and how

¹ *Electronic Investigation into the Affordability of Electric and Natural Gas Utility Service and Related Matters*, Case No. 2026-00185, Order at 4 (Aug. 26, 2026) (hereafter “Order”).

² *Id.* at 13.

that impacts their lives. Earlier this year, as part of its affordability investigation, the Indiana Utility Regulatory Commission held ten public listening sessions throughout the state over a two-month period.³ Sierra Club is a grassroots organization with dues-paying members in 116 of Kentucky's 120 counties, and we know that among our members in Kentucky there are a diverse set of concerns about energy affordability across the state. As the Commission recognized in initiating this docket, "costs and affordability vary across the Commonwealth and among utilities and customer groups."⁴ Given the potentially wide disparity in the energy burden for Kentuckians residing in one part of the state from another, Sierra Club believes that the Commission should take steps to ensure that this process affords the opportunity for the Commissioners to hear directly from Kentuckians in all parts of the state. One way the Commission could accomplish this is to host listening sessions across the Commonwealth, attended by the Commissioners, so that the voices and concerns of Kentuckians remain centered throughout this process.

In addition to that critically important procedural step, and the 16 specific issues already identified by the Commission in its Order,⁵ Sierra Club submits that issues listed below should be investigated. Given the number of potential avenues for deeper analysis, Sierra Club recommends that the Commission engage in initial fact-finding and data collection before selecting topics that merit a subsequent stakeholder process. Bifurcating the process in this way may help the Commission identify statewide trends, programmatic gaps, or emerging best practices and accompanying issues appropriate for stakeholder processes based on the likelihood

³ 2026 *Investigative Inquiry on Energy Affordability*, Indiana Utility Regulatory Commission, <https://www.in.gov/iurc/investigative-inquiry-on-energy-affordability>.

⁴ Order at 6.

⁵ *Id.* at 7-10.

of that effort leading to actionable solutions that help address rising electric and gas prices in Kentucky.

- Average residential gas and electric costs, by utility;
- Average household energy burden, by utility;
- The composition of energy generated and/or procured by a utility (such as coal, gas, wind, solar, or nuclear), compared with the electric costs and energy burden, by utility;
- Historic trends in electric and gas prices in Kentucky, by utility;
- The average capital costs to maintain aging coal-fired power plants;
- The average cost, per megawatt hour, to Kentucky utilities for various types of generation resources;
- Available utility incentive programs that help customers weatherize their homes;
- Available utility incentive programs that help customers reduce reliance on gas appliances and heating;
- Available utility incentive programs that help customers offset the cost of home batteries;
- The availability and economic benefits to residential customers of demand side management programs;
- Availability of residential time-of-use electric rates, by utility;
- The use and design of virtual power plants by Kentucky utilities;
- Identification and implementation of affordability metrics to hold utilities accountable for maintaining affordable electric and gas service;
- The impact of SB 349 on electric prices in Kentucky;
- How utilities are planning to track costs associated with new large load data centers and ensure compliance with the Governor's recent Executive Order 2026-494.

Sierra Club appreciates the opportunity to weigh in at this early stage of the Commission's review of rising electric and gas costs in the Commonwealth. Sierra Club looks forward to working with the Commission, staff, and other stakeholders throughout this collaborative process.

Dated: September 30, 2026.

Respectfully submitted,

/s/ Joe F. Childers

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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Initial Comments in this action is being electronically transmitted to the Commission on September 30, 2026, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers
JOE F. CHILDERS