To: "Sam Avery"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:17:00 AM

Dear Mr. Avery-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:39 am, Nov 01, 2016

Andrew Melnykovych

Andrew.Melnykovych@ky.gov

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)

From: Sam Avery

Sent: Sunday, October 23, 2016 11:47 AM

**To:** PSC - Public Information Officer

Subject: Comment on case number 2016 - 02740 LGE /KU shared solar proposal

As a professional solar installer, I am delighted to see LG and E and K U reach out to customers for conversion to solar energy. But this is not a good plan.

I have to turn down many potential customers because they do not have a good site on their house or their yard for a solar installation. These people need a community solar opportunity where they can purchase solar production facilities at another site. This is the intention of community solar Outreach projects. The Proposal under consideration does not allow customers to own their own solar production; essentially, all it does is double or triple their electric rate.

At a time when the price of solar energy production is coming down to parity with fossil fuel production, this project perpetuates the myth that solar is too expensive for practical conversion.

I look forward to a time when the Public Service Commission will approve Community solar projects where investors can pool resources and feed solar energy into the grid to offset their home usage, or even sell energy to the utility.

Thank you for allowing us this opportunity to provide feedback.

Sam Avery Avery and Sun Solar Installations

To: "Bhatt"

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:18:00 AM

Dear Mr. Bhatt-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### **RECEIVED**

By Kentucky PSC at 9:46 am, Nov 01, 2016

Andrew Melnykovych

Director of Communications

Kentucky Public Service Commission

502-782-2564 (direct) or 502-564-3940 (switchboard)

502-330-5981 (cell)

Andrew.Melnykovych@ky.gov

From: Bhatt

Sent: Monday, October 24, 2016 2:37 PM

**To:** PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

I am writing to register my concerns about the LG&E/KU Solar Shares proposal. While the idea of making solar energy accessible to Kentuckians is laudable, the details of the proposal by LG&E/KU are such that the proposed project is clearly not in the interest of customers.

First, the monthly charges are extremely high and not in line with actual costs of solar generation. It appears that LG&E/KU is proposing to charge customers 3 to 4 times the current costs of solar power. Moreover, customers do not gain any long-term benefits from subscribing to the LG&E/KU system because, unlike those who have their own solar systems, they do not have a period of no-cost generation after the initial investment.

Second, the LG&E/KU proposal does not allow subscribers to roll over excess generation, which is a major part of the attraction of solar power for those who are able to access their own solar generation capacity. This means that the subscriber is cut-off from a major part of the benefits of solar generation.

Third, the costs and benefits are not clearly spelled out, so that it is exceeding difficult for the average person to understand what is being offered and at what price.

Fourth, the proposal, by being so expensive, inherently discriminates against low-income individuals and small businesses, who otherwise may not be able to access solar energy.

I strong urge the PSC to reject the present proposal and direct LG&E/KU to restructure their proposal to make it cheaper and more accessible to customers. Unfortunately, it appears that the project is planned to generate excessive profits for the shareholders of LG&E/KU at the expense of customers and Kentuckians.

Thank you.

Ramesh Bhatt 1000 Rain Court Lexington, KY 40515

To: "Ryan Fenwick"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:13:00 AM

Dear Mr. Fenwick-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

### **RECEIVED**

By Kentucky PSC at 9:32 am, Nov 01, 2016

### Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Ryan Fenwick

**Sent:** Friday, October 21, 2016 9:20 AM **To:** PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

Dear Public Service Commission,

Clean energy is a no brainier for our Commonwealth, especially in air control day ridden Louisville. Solar panels are a great idea, but need to be implemented in a way that is affordable and well-marketed. The price of solar is going down all the time. Talk to regular people and if the price works, and it can, then they want solar. Please carefully consider the price structure. LGE deserves to profit, but not on the scale they propose.

Sincerely,

Ryan Fenwick Attorney Law Office of Ryan Fenwick 1217 Logan Street Louisville, KY 40204

To: "Matt Gilbert"

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:11:00 AM

Dear Mr. Gilbert-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:27 am, Nov 01, 2016

# Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Matt Gilbert

**Sent:** Friday, October 21, 2016 4:31 AM **To:** PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

Public Information Officer.

My name is Matt Gilbert and I'm sending this email in regards to the proposal from LGE/KY Solar Share program. I'm a Kentucky resident in Oldham County and am interested in the prospect of this solar share program being approved. However, I do have some concerns regarding LGE's proposal which I'm concerned will deter potential customers like myself from investing in solar panels due to the unnecessary expense. My concerns are as follows:

- 1.) LG&E's proposal has a subscription cost expressed as "\$6.29/ 1/4 KW per month, I don't know what that means? This unit price bears no relationship to the rates I pay on my utility bill, expressed \$/kWh with the total amount to pay per month highlighted. This is much easier to understand, while LG&E's language is difficult to decipherer. Why doesn't LGE instead show the pricing in a more clearly understandable way, like "save \$X per month per panel leased"?
- 2.) It's come to my attention the monthly cost for the subscription from LG&E is excessive, unreasonable in fact. LG&E is proposing to charge Subscribers three to

four times the going market rate for solar in the state of Kentucky! They are asking subscribers to pay \$6.29 a month for solar capacity per panel, while proposing to pay only 4 cents/kWh for the solar-generated electricity. So they expect to value the output of these PV panels at an average of \$1.20 per month or less. Why should the subscriber be asked to pay so much more to rent a panel than the value of the panel's output?

- 3) The average cost for the solar energy supplied by LG&E would amount to at least **\$0.21/kWh**, when the current cost of installing a solar panel is typically about **\$0.075/kWh** for residential systems and **\$0.062/kWh** for commercial scale. That's approximately an three fold increase.
- 4) The LG&E proposal offers no ROI (return on investment) in easy to understand terms. I'd like to know when I'd recoup the initial purchase cost of the solar panels over a period of time / years. The proposal offers no way for a potential buyer to receive the normal long-term benefits from paying off the initial investment and then continuing to receive almost free electricity for an approximate amount of years.
- 5) LG&E's proposal seems to show that "solar is too expensive," because their proposal **is** too expensive. EKPC, another major electric utility, is offering a community solar proposal which seems to provide much fairer pricing to subscribers than the LG&E proposal. By comparison, the pricing proposed by the LG&E program seems unreasonable. I'm concerned this type of plan will deter many residents and companies from investing it what could be a truly beneficial budding industry for all of Kentucky.

Please consider these issues when processing this proposal from LG&E.

Regards,

Matt Gilbert 1301 Meadowridge Trl Goshen, KY 40026

To: "Nancy Givens"

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:19:00 AM

Dear Ms. Givens-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### **RECEIVED**

By Kentucky PSC at 9:49 am, Nov 01, 2016

### Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Nancy Givens

Sent: Wednesday, October 26, 2016 2:42 PM

To: PSC - Public Information Officer

Subject: Re: Comment on case number 2016 - 02740 LGE /KU shared solar proposal

To the Public Service Commission.

As an advocate for solar energy in Louisville and Kentucky, and someone who is employed in the solar industry, I am pleased that LG&E and KU are taking steps to add solar energy to their energy portfolio - with the 10 MW solar farm, commercial solar leasing program, and newly proposed Shared Solar program. However, the Shared Solar program as proposed appears to be significantly overpriced and falls far short of the potential benefits to consumer and community from a community solar program.

It is now well established that solar energy can offer many advantages to communities including reduced carbon emissions and climate change; reduced other emissions that can improve air quality and public health; reduced fuel costs and operating and maintenance costs to the utility; reduced transmission losses by adding power to the grid closer to where it is used; creating local jobs and boosting the local economy; and diversifying the power supply which adds security and resilience to the grid.

Community Solar has the potential to contribute other shared benefits to utilities. consumers, and communities, and has been implemented widely in cities and states throughout the U.S. Specifically, people and businesses which do not have a good situation or site for solar - e.g., where there are shading issues, the building is not well oriented for solar, or with renters - are able to invest in solar energy and assist with the transition toward clean and renewable energy sources. Since the cost of solar today is dramatically lower in the past, and with larger scale projects typically able to install solar at a lower cost per watt, community solar offers the prospect to yield a good return on investment not only to the utility but also to customers and communities.

Value of Solar studies done by other states and organizations have shown a net positive value to utilities from decentralized solar. The LG&E-KU Shared Solar model does not reflect this value, and does not confer benefits consistent with this analysis to the customers who would purchase panels under the Shared Solar program. The way the pricing is set up yields excess profits to the utility and excludes customers from any Return on Investment for their purchase of panels, as they would benefit from if they installed the panels on their home or business. Community Solar programs can, and I would assert should, provide shared benefits to the utility, customer, and community, yet the proposed LG&E-KU Shared Solar model fails to do this.

Finally, the proposed LG&E-KU Shared Solar program is set up as a monopoly, whereas I believe a greater good will come when businesses, neighborhoods, or others can pool resources to set up a constituent-based community solar program, where those purchasing into the system could use the solar energy produced directly or put any excess produced onto the grid for credit through net remote metering.

Multi-national companies and increasingly local and regional companies are demonstrating a strong demand for renewable energy. Hence, renewable energies will need to be given an increasing role in Kentucky's energy future. Decisions made today will impact the affordability of energy in our state in the future. The Shared Solar model proposed by LG&E-KU will unnecessarily drive up costs of solar energy for customers and communities, and this will impact Kentucky's future potential for economic development negatively. Because this proposed program is one of the first to be considered in Kentucky, it will set a precedent. To keep electricity costs down and protect future economic development in our state, I urge the Public Service Commission to request that LG&E-KU restructure its Shared Solar proposal to more fairly share the cost-savings and other potential benefits of community solar with its customers and the community.

Thank you for this opportunity to provide feedback.

Nancy Givens

Solar Over Louisville Planning Team Kentucky Solar Energy Society Avery and Sun Solar Installations

To: "Carl Hall"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:16:00 AM

Dear Mr. Hall-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:36 am, Nov 01, 2016

### Andrew Melnykovych

Andrew.Melnykovych@ky.gov

Director of Communications Kentucky Public Service Commission 502-782-2564 (direct) or 502-564-3940 (switchboard) 502-330-5981 (cell)

From: Carl Hall

**Sent:** Saturday, October 22, 2016 10:16 AM

To: PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

Although I support LG&E/KU's application to create a "Solar Shares" program at a conceptual level, the proposal, as submitted, places an unreasonable and excessive cost burden on the subscribers. One might ask how sincere LG&E/KU are in implementing a shared solar program, if this is the best they can offer.

The Kentucky Solar Energy Society has produced a review of LG&E/KU's proposal and the concerns described in that document reflect mine. I refer you to that document for a thoughtful and reasoned analysis of the impacts that LG&E/KU's proposal would have on the subscriber, if it is implemented as proposed.

I would argue that LG&E/KU's proposal is worse than having no "Solar Share" project at all, since those who take part in the program would be so seriously economically disadvantaged that the only conclusion reasonable people could reach is that shared solar isn't economically possible in Kentucky. Other states (with other power producing/distributing monopolies and other utility commissions) appear to be able to build reasonable shared solar systems that don't penalize the subscriber in the ways that LG&E/KU's proposed system would. If they can do it, why can't we?

Carl Hall

4718 Kitty Hawk Way Louisville, KY

To: "Daniel Holder"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:18:00 AM

Dear Mr. Holder-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

**RECEIVED**By Kentucky PSC at 9:45 am, Nov 01, 2016

### Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Daniel Holder

Sent: Monday, October 24, 2016 10:05 AM

To: PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

Dear PSC,

Thank you for reading this comment and taking the matter of our energy options seriously.

As the body responsible for regulating our electricity industry, you have the responsibility to do what is in the best interest of the public. What LGE/KU is proposing for a solar leasing model is not that. I suggest you take one of two actions. 1) require LGE to offer rates that are competitive outside of a regulated environment. 2) deregulate the solar leasing model. I also urge you to take into consideration non-economic costs into the calculus of good policy decisions.

According to your own opinions, the legal ability to lease solar panels (and other forms of generation) commercially currently falls exclusively to LGE and KU within their service territory. If this continues to be the law of the commonwealth, then LGE KU must also be required to offer competitive rates. Their proposed 21 cents/kWh is not competitive. For companies that are already operating in Kentucky, the current price of installing solar PV of about \$0.075/kWh for residential systems and approximately \$0.062/kWh for commercial scale systems. That isn't the cost the companies face, that is the price they charge. If you are to deregulate parts of the electricity sector, customers (citizens too) will be able to have more options, and almost certainly cheaper options in the future.

As the regulatory body, you also have the responsibility to factor in the non-economic costs to citizens of Kentucky, including the health costs of pollution and the uncertain long-term costs of continuing to emit carbon. Here is the EPA's methodology: <a href="https://www3.epa.gov/climatechange/Downloads/EPAactivities/social-cost-carbon.pdf">https://www3.epa.gov/climatechange/Downloads/EPAactivities/social-cost-carbon.pdf</a>

Thank you for your time, Daniel Holder

To: "Davida H. Isaacs"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:11:00 AM

Dear Mr. Isaacs-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

RECEIVED

By Kentucky PSC at 9:25 am, Nov 01, 2016

# Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Davida H. Isaacs

Sent: Thursday, October 20, 2016 10:42 PM

To: PSC - Public Information Officer

Subject: Comment on Case # 2016-0274 -- the LGE/KU Shared Solar Proposal

I am an enormous supporter of solar energy. As a result, I am deeply disturbed by the high cost of the LG&E/KU Solar Subscription proposal. Other forms of energy have such enormous negative external costs -- primarily, damage to the environment and damage to people's health in creating and using it. In contrast, solar is now quite cheap to use -- and, as importantly, has fairly few external costs, and almost no external costs to the *individual residents* of Kentucky (placing aside the corporations' interests).

Yet the monthly cost for the Solar Subscription is excessive and unreasonable, proposing to charge Subscribers three to four times the going market rate for solar in the state of Kentucky. It is clear that LG&E/KU is avoiding the opportunity to make solar energy truly accessible to their lower-income customers and renters. If the Solar Shares proposal reflected the true costs and benefits of solar energy, it would be much more affordable and accessible to all customers.

The State government should be encouraging Kentucky to lead the way in this (frankly, highly and quickly inevitable!!) form of energy. At this point,

failing to support the quick adoption of solar power is just asking Kentucky to lag behind other states and to continue to be regarded as a backwater state.

Regards, Davida Isaacs

To: "Jessica Kane"

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:18:00 AM

Dear Ms. Kane-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:42 am, Nov 01, 2016

Andrew Melnykovych

Andrew.Melnykovych@ky.gov

Director of Communications Kentucky Public Service Commission 502-782-2564 (direct) or 502-564-3940 (switchboard) 502-330-5981 (cell)

From: Jessica Kane

**Sent:** Monday, October 24, 2016 8:13 AM **To:** PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar

Overall, KySES supports LG&E/KU's intention to make solar energy more accessible to their customers. However, we have a number of serious concerns about the terms of the proposal which we believe should be addressed before the Solar Shares program is approved. One concern is that the monthly cost for the Solar Subscription is excessive and unreasonable as it proposes to charge Subscribers three to four times the going market rate for solar in the state of Kentucky. The Subscriber's cost for the solar energy supplied by LG&E/KU each year amounts to at least \$0.21/kWh which is in excess of the current cost of installing solar PV of about \$0.075/kWh for residential systems and approximately \$0.062/kWh for commercial scale systems.

Sincerely,

Jessica Kane

\_\_

To: "Gerald Karem"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:10:00 AM

Dear Mr. Karem-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

RECEIVED

By Kentucky PSC at 9:23 am, Nov 01, 2016

Thank you for your interest.

# Andrew Melnykovych

Andrew.Melnykovych@ky.gov

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)

From: Gerald Karem

Sent: Thursday, October 20, 2016 8:40 PM

**To:** PSC - Public Information Officer

Subject: Case Number 2016-00274 - Conner Station Road Solar Plant

Mr. Melnykovych

Enclosed please find a letter to Dr. Matthews regarding the above referenced case.

I have a very hard time following and understanding the various orders and documents as posted on your website. The following link: <a href="http://psc.ky.gov/pscscf/2016%20Cases/2016-00274/20160812\_PSC\_ORDER.pdf">http://psc.ky.gov/pscscf/2016%20Cases/2016-00274/20160812\_PSC\_ORDER.pdf</a> discusses a Jan 2017 date which I interpreted as the date when the PSC will decide the on the case. I've read other things which indicate LG&E is requesting a Nov 1st answer. When you and I talked a couple of weeks ago, you mentioned a date had not been set for a hearing. Today I read <a href="http://psc.ky.gov/pscscf/2016%20Cases/2016-00274//20161018\_PSC\_IC\_NOTICE.pdf">http://psc.ky.gov/pscscf/2016%20Cases/2016-00274//20161018\_PSC\_IC\_NOTICE.pdf</a> which seemed to be addressed to attorney's for everyone re an informal conference call. Did the call take place, what was discussed. Has there been a date set for a hearing? If so, what is the date and what is the process for those of us in opposition to become involved? If a date has not been set, how do we register with the PSC so we are notified of the date? Will there even be a hearing? Many of my neighbors have written letters to the PSC opposing the solar plant, some have received correspondence acknowledging receipt of their letters, many have not. Are the letters of opposition posted on your web site? What's the link?

I'm positive your answers to the above will create more questions and for that I apologize, however not having the experience or financial clout of LG&E we appreciate any assistance you can give us.

Thank you very much Jerry Karem Thursday, October 20, 2016

Dr. Talina Matthews
Director Public Service Commission
P.O. Box 615
Frankfort KY 40602

PSC Case # 2016-00274, LG&E / KU Voluntary Solar Plant Conner Station Road Shelby County KY

Dear Dr. Matthews:

In early August the residents in my neighborhood received a letter from Mr. David Huff, Director of Customer Energy at LG&E/KU, inviting us to a "neighborhood meeting" to inform us of their intent to build a solar power electrical generating plant on a 35-acre site located directly across the street from the entrance to our development. The site is at the south-east corner of Conner Station Road immediately north of I-64. The facility, when complete, would contain approximately twelve thousand solar panels which will be about seven to nine feet off the ground. It's our understanding the site will be surrounded by a six-foot chain link fence, and staggered evergreen trees.

Being concerned about maintaining the rural setting of our neighborhood and our property values, approximately seventeen of our neighbors attended the August 23<sup>rd</sup> meeting. The representatives of the power company could not have been nicer, listened to our concerns, and to some extent, other than agreeing to building somewhere else, agreed to consider some of our suggestions regarding screening etc.

We asked Mr. Huff why they picked this particular site which is adjacent to a rural upper end residential area vs picking a site in an industrial area or in the middle of open farm land. His answer was simple and straightforward. The subject property was for sale, the location is sort of centered between the KU and LG&E market areas, and most importantly it has good visibility from an interstate.

Because the solar plant will impact the natural beauty and rural character of the neighborhood and the property values, I was very surprised **only two** of the ninety or so families who live on Conner Station Road south I-64, most of which must pass the proposed solar plant site daily, were present at neighborhood meeting. I emailed Jim Holderman, Manager of Real Estate for LG&E / KU on August 25<sup>th</sup> asking who was invited, his response follows.

Dear Mr. Karem -

Thank you for contacting us with your questions. As far as the meeting this past Tuesday, I was not able to attend, but we are glad that you took to time to come learn more about the project. For projects similar to this, we notify the local elected officials ahead of anyone, we then notify the adjoining property owners, as well as anyone whom we believe would be most impacted by the construction of a project. For the Solar Share Project, we mailed letters to 20 property owners, which included two owners south of I-

64. Although our proposed use of the property as a generation facility is exempt from zoning, we have much respect for the zoning regulations, and with that we notified adjoining owners. We anticipated others learning about the project through word of mouth discussions with family and friends, as well as the media outlets

I think its little odd (sneaky, underhanded, sly, devious, shifty) that LG&E contacted less than 20% of the people who will be affected by the project and also is sort of odd that the one and only "Public Notice", placed in the Shelby County newspapers was published on August 24<sup>th</sup>, the <u>day after</u> the neighborhood meeting. Basically they eliminated the input and questions from ninety or so families whose property will be impacted. My impression from the meeting is they didn't look at many sites, or, that they really do not care about the impact to our neighborhood.

A few days after the neighborhood meeting I sent a letter describing the proposed facility to everyone living south of I-64, this was approximately 96 homes. I received an incredible amount of negative feedback, many expressed shock because they hadn't heard about it. I emailed David Huff on September 30<sup>th,</sup> suggesting they might have a second neighborhood meeting to help fill everyone in. Included in the same email I asked for details relating to construction and screening. I was wondering if any of the screening ideas discussed in the neighborhood meeting had been incorporated into their plans. In his response on October 3<sup>rd</sup>, Mr. Huff denied the request for a second neighborhood meeting and briefly described the site improvements. Very little, if any of the additional screening discussed at the meeting was included, actually his written description contained less screening. Mr. Huff did not mention the addition of electric transmission lines and related buildings to service the solar plant.

I've read more about Solar Plants in the last month or so than I ever anticipated. The more I read the more I'm confused about LG&E's site selection and economic decisions. A very small part of what I've read is shown below.

- > Because a Solar Farm is a Solar Plant then there are studies that show an industrial site in residential areas can affect property values.
- Solar power is very expensive, is not cost efficient and without government assistance would rarely be built.
- Renewables, while gaining traction, have their drawbacks. Solar panels only generate their peak electricity when the sun is out and their output can fluctuate wildly, which LG&E and KU already have observed at its E.W. Brown solar array. Solar power output also fluctuates with the seasons. Less daylight in the winter means less power generation. Kentucky's potential for large-scale solar power generation is limited.
- If you were investing a million dollars of your money in a piece of property and you had two choices to make: one was beside a corn field and one was beside a solar farm, which one would you choose? If you automatically would choose the one that was not beside the solar farm, then you would probably have to agree that it is going to impact the value of that property.
- Because they are generally large facilities with numerous highly geometric and sometimes highly reflective surfaces, solar energy facilities may create visual impacts; however, being visible is not necessarily the same as being intrusive. Aesthetic issues

- are by their nature highly subjective. Proper siting decisions can help to avoid aesthetic impacts to the landscape.
- > There were lots of articles on the environmental impacts, I believe the conclusion is because solar is new, no one really knows the long term consequences.

If the project goes forward, and if they haven't already done so, I think it is very important, that LG&E/KU be required to file testimony concerning potential **property value impacts** as a result of the solar plant, and to supply "**detailed**" mitigation measures for the proposed facility. There should also be some form of environmental impact study.

Quite frankly, I guess none of the above makes much difference. I realize its practically impossible for a group of ordinary citizens to compete financially or otherwise with LG&E, especially considering the powers given the utility companies through state statutes. Its blatantly evident this project location was chosen for nothing more than enhancing the image of LG&E and with little or no regard to surrounding property values. What's even more disappointing, LG&E can create the same amount of solar energy, on an interstate or a non- interstate location in Shelby County, on one of the many available sites more suited to industrial use, and can do so without devaluating the surrounding property.

I'm certainly not smart enough to comprehend or understand the statute as it relates to the vast authority given to utility companies, however it makes me wonder if the intent of those laws are to allow the utility to be exempt from zoning for a voluntary project, especially one which will serve only five hundred homes, just for the purpose of enhancing their image.

To conclude, all of us are interested in alternative energy sources, however we are **strongly opposed** to the location selected. There are several commercial and industrial sites available within a few miles of this location, all with equal or better I-64 visibility, including an interstate location which is already owned by the commonwealth which has been offered by the Shelby County Judge Executive. None of the alternative sites would impact the property values or visual impacts of any residential areas.

Your help on this matter would be greatly appreciated. This is a very important issue to me and our neighbors and I hope the PSC can help persuade LGE/KU to choose an industrial location for this project.

Kaum

Sincerely,

Jerry Karem

1015 Wooded Lake Drive Simpsonville, KY 40067

To: "Carissa Lenfert"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:12:00 AM

Dear Ms. Lenfert and Mr. Lowhorn-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:28 am, Nov 01, 2016

# Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Carissa Lenfert

**Sent:** Friday, October 21, 2016 7:08 AM **To:** PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

I support solar energy as an LG&E customer and would like to purchase solar energy, but the monthly cost on this is too high and cost prohibitive for my family.

Thanks, Carissa Lenfert & Alan Lowhorn 3704 Old Brownsboro Hills Road Louisville, KY 40241

To: <u>"Theresa Martin"</u>

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:13:00 AM

Dear Ms. Martin-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:33 am, Nov 01, 2016

### Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Theresa Martin

**Sent:** Friday, October 21, 2016 10:50 AM **To:** PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

To: the Kentucky Public Service Commission

Please see my comments below regarding Case 2016-0274 LGE/KU Shared Solar Proposal.

Overall, I am supportive of LG&E/KU's intention to make solar energy more accessible to their customers. However, I have a number of serious concerns about the terms of the proposal which I would like the PSC to address before the Solar Shares program is approved. One concern is that the monthly cost for the Solar Subscription is excessive and unreasonable as it proposes to charge Subscribers three to four times the going market rate for solar in the state of Kentucky. The Subscriber's cost for the solar energy supplied by LG&E/KU each year amounts to at least \$0.21/kWh which is in excess of the current cost of installing solar PV of about \$0.075/kWh for residential systems and approximately \$0.062/kWh for commercial scale systems

Further, I will detail my concerns with the LG&E/KU proposal as it relates to pricing.

This pricing is simply unfair to Subscribers who are well-intended in investing in Solar for their homes and communities, yet are very likely not aware that this is an excessive price to pay for energy. LG&E/KU should be held accountable and not allowed to price gouge their customers and I feel it is

your duty as the PSC to ensure this does not happen.

Secondly, if you as the PSC, allow LG&E/KU to charge this amount for community solar, you are enabling this price to be the benchmark for all utility scale community solar subscriptions. This is a serious problem because it is simply wrong to allow LG&E/KU to include what appears to be profits for their company in the price of solar. Allowing this will cause community solar in Kentucky to not be a viable and cost effective option for Kentuckians.

Please consider my views as representative of the more informed and concerned citizens of the state of Kentucky. Solar should be priced correctly so that Kentuckians can BENEFIT from it, not be taken advantage of by utilities hoping to profit unfairly by it.

Sincerely and respectfully, Theresa J. Martin

To:

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:19:00 AM

Dear Mr. Mog-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:47 am, Nov 01, 2016

### Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From:

**Sent:** Tuesday, October 25, 2016 12:52 AM

To: PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Solar Shares Proposal

Dear PSC,

I'm writing as a customer of LG&E and as a sustainability professional with a strong interest in seeing a rapid deployment of renewable energy systems throughout Kentucky to submit comments with regards to LG&E/KU's application to create a 'Solar Shares' program (Case 2016-0274).

Of course, I am in full agreement with LG&E/KU's overall intention to make solar energy more accessible to their customers. I do, however, have a number of serious concerns about the terms of the proposal which need to be addressed before the Solar Shares program is approved:

- 1. First of all, it's clear that the monthly cost for the Solar Subscription is excessive and unreasonable. How can anyone justify their proposal to charge Subscribers three to four times the going market rate for solar in the state of Kentucky? The Subscriber's cost for the solar energy supplied by LG&E/KU each year amounts to at least \$0.21/kWh which is in excess of the current cost of installing solar PV of about \$0.075/kWh for residential systems and approximately \$0.062/kWh for commercial scale systems. I know this to be true as a homeowner who has installed a 4kW PV system on my own roof.
- 2. Not only is the fee unreasonably high, but it will be presented to customers in a way that

- makes it almost **impossible to understand or compare the cost of the solar energy being offered**. This needs to be fixed.
- 3. A true community solar approach would charge customers a reasonable amount to lease solar panels, and would give customers full credit on their bills at the retail rate for the solar energy generated. A great community solar project would also include a way for low-income customers to lease panels at a reduced rate.

Kentuckians, whether we live in Louisville or Lexington or anywhere else in the Commonwealth, want better energy choices and options. We want access to affordable, clean energy. It's encouraging that Kentucky's utilities are now beginning to make investments in renewable energy. But the Public Service Commission must make sure that the costs to customers are fair and reasonable.

Sincerely,

Dr. Justin Mog 800 Goullon Ct. Louisville, KY 40204

---

Justin Mog, Ph.D.
Assistant to the Provost for Sustainability Initiatives
University of Louisville | <u>louisville.edu/sustainability</u> | 5
215 Urban Studies Institute | 426 W. Bloom St. | Louisville, KY 40208

To:

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:17:00 AM

Dear Mr. Morris-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:38 am, Nov 01, 2016

### Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Jack Morris

**Sent:** Saturday, October 22, 2016 2:29 PM **To:** PSC - Public Information Officer

Subject: Comment on case 2016-00274

This comment is about comparing the proposals from LGE/KU (2016-00274) and EKPC (2016-00269). As I understand them, here are the proposal comparisons

Proposal	Initial Investment	Monthly fee	Credit/kWh
LGE/KU	\$40/Quarter kW	\$6.29/Quarter W	\$0.04/kWh
		share	
EKPC	\$460/335W	\$0	\$0.08/kWh

I'm assuming that LGE/KU and EKPC retail power rates are the same to the customer (~\$0.08/kWh) and the EKPC proposal gives a 1:1 credit for energy produced. On the basis of 1kW DC purchased generating capacity, you would expect to generate about 1300Wh/year in Winchester and Simpsonville KY.

Clearly, the LGE/KU proposal gives you a lower cost of entry, but the monthly fees quickly make this a much worse deal for the customer. My calculations say that you pay off your initial investment and come out ahead (for the remainder of the 25 Year lease for the EKPC proposal) after about 3 years. The biggest driver of the inferiority of the LGE/KU proposal is the monthly fee. The difference in credit accounts for about 20% of the payoff time.

As I said in my previous comment, I am not opposed to LGE/KU making a community solar offering. On the contrary, they are to be applauded for making this option available to their

customers. I am only pointing out that a much better deal for the customer is possible. What clearer comparison than with EKPC (similar geography, similar (if not the same) power costs, similar timeframe, . . .) could you ask for and how different the proposals are!

--

Sincerely, Jack W. Morris

To: "Bill Slater"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:12:00 AM

Dear Mr. Slater-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc ky.gov/PSC">http://psc ky.gov/PSC</a> WebNet/ViewCaseFilings.aspx?case=2016-00274.

Thank you for your interest.

Andrew Melnykovych
Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

#### **RECEIVED**

By Kentucky PSC at 9:30 am, Nov 01, 2016

----Original Message-----

From: Bill Slater

Sent: Friday, October 21, 2016 7:34 AM To: PSC - Public Information Officer

Cc: matt@solar-energy-solutions.com; Steve Ricketts

Subject: Comment Case 2016 0274 LG&E KU SOLAR SHARES

#### To Whom It May Concern:

The cost to the subscriber is high. By some estimates the cost is three times as high (\$0.21/kWh). Meanwhile the net-metering cap remains at 30kW. This puts would-be solar adopters in an untenable position; especially commercial enterprises whose power needs eclipse the current net metering cap. To charge \$0.21/kWh while restricting system size seems unfair to subscribers and to free market principles.

Bill Slater

Sent from my iPhone

To: "Elwood Sturtevant"

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:17:00 AM

Dear Mr. Sturtevant-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

RECEIVED

By Kentucky PSC at 9:41 am, Nov 01, 2016

# Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Elwood Sturtevant

**Sent:** Sunday, October 23, 2016 2:16 PM **To:** PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

I am a strong supporter of solar power and increasing the access to solar power Louisville, given the reality of climate change and our community responsibility to make efforts to mitigate the problems already occurring. However, I am concerned that the LGE/KU proposals seem designed not to achieve the use of solar power, but to discourage its use. It appears they are presenting solar power as more expensive than it really is.

That is, the proposed monthly cost is too expensive as a rental – I understand that the rate will be \$6.29/month while the average output of a panel is expected to be about \$1.20/month. A proposal involving payments that resulted in eventual ownership rights to the panel and a credit for energy produced against energy used would be more attractive. Fairer pricing would make the project more successful. Similarly, clearer pricing would help customers compare what they are currently paying for energy to what they would receive under the program.

I have worked with the community ministries for decades, and have seen the contributions of ordinary people to programs like "Winter Help" wind up going to the public utilities, while necessary energy remains expensive for the poor who often live in energy-expensive housing. A public utility that actually served the public interest would create a "life-line" rate for low-income consumers should be a part of any rate revision, as well as assistance in bringing down usage through promoting

efficiency in ways that the poor can afford to implement. Solar energy should be used to help the poor, especially when solar energy brings so many benefits to the public utilities.

The net-metering cap of 30 KW prevents people with the resources and commitment from bringing more solar into use in Kentucky; this proposal has the feel of attempting to divert attention away from the need for more privately owned solar. EKPC apparently has a different, more fair community solar plan; LGE/KU should do at least as well for their customers.

Thank you —
Rev. Elwood Sturtevant
Minister, Thomas Jefferson Unitarian Church
(home) 3712 Trail Ridge Rd
Louisville, KY 40241

9. EKPC, another major electric utility, is offering a community solar proposal which seems to provide much fairer pricing to subscribers than the LG&E/KU proposal. By comparison, the pricing proposed by the LG&E/KU program seems unreasonable and excessive. How can LG&E/KU defend against this?

To: "Brent Sweger"

Subject: Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:14:00 AM

Dear Mr. Sweger-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### **RECEIVED**

By Kentucky PSC at 9:34 am, Nov 01, 2016

# Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: Brent Sweger

Sent: Friday, October 21, 2016 1:50 PM To: PSC - Public Information Officer Subject: Case 2016-0274 LGE/KU

I would like to submit my thoughts on the proposed charges for the new solar subscription service that LGE/KU is proposing. I believe that the rates that the company charges should be affordable and clearly understood by customers.

The rates that are approved should obviously cover the cost to build the new system plus a reasonable rate of return on their investment. This must be balanced with providing customers a reasonably priced solar option. In my opinion, the proposed residential and commercial rates are excessive. To be reasonable, the charges (before considering profit) should be in line with what an individual or company would pay over 20 or 25 years (per kWh) factoring in the federal tax credit. That would end up being between seven and ten cents per kWh. A reasonable profit on top of that of ten percent would increase the rate by about another one cent. I could possibly support a profit of two cents per kWh over the payoff rate would be. Finally, I hope that the charging structure is simple and understandable for an average customer. It should simply be based on the amount of electricity that they use that is attributable to solar. If the bill is normally 1500 kWh and they decide to invest in 500 kWh of solar per month, then they would be charged the first 500 on the solar rate and the remaining 1000 on the conventional rate.

Thank you for the opportunity to comment on this case.

Brent Sweger 108 West Todd Street Frankfort, KY 40601

To: "Linton Wells"

**Subject:** Your comments in case 2016-00274 - KU-LG&E solar share facility

**Date:** Tuesday, November 01, 2016 9:11:00 AM

Dear Mr. Wells-

The Kentucky Public Service Commission has received your comments in the above-referenced case. They will be placed into the case file for the commission's consideration as it deliberates in this matter.

The case file may be viewed here: <a href="http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274">http://psc.ky.gov/PSC\_WebNet/ViewCaseFilings.aspx?case=2016-00274</a>.

Thank you for your interest.

#### RECEIVED

By Kentucky PSC at 9:24 am, Nov 01, 2016

# Andrew Melnykovych

Director of Communications Kentucky Public Service Commission 502-782-2564 (direct) or 502-564-3940 (switchboard) 502-330-5981 (cell)

Andrew.Melnykovych@ky.gov

From: Linton Wells

**Sent:** Thursday, October 20, 2016 10:10 PM

To: PSC - Public Information Officer

Subject: Comment on Case 2016-0274 LGE/KU Shared Solar Proposal

I own a 7.5 kw grid-tied rooftop solar power system net metered into the KU system in Winchester, KY on a home I currently own there. It is comprised of (25) 300 watt solar panels facing unobstructed due south at about a 30 degree angle. Here is the real time and historical production of such: <a href="http://www.tigoenergy.com/site.php?wellsresidence">http://www.tigoenergy.com/site.php?wellsresidence</a>

Installation date was a little over 1 year ago, by a Kentucky licensed/certified solar power installer. I provided no installation labor or materials for the installation, and I paid full market retail price for such at that time in my view.

Last year, the system produced about 11,000 kwH of electricity.

The system has a 25 year panel warranty and is calculated to average 8,700 kwH of production annually, for total lifetime estimated production of 217,500 kwH.

My net installation cost, after federal and state tax credits, was \$13,500, resulting in a lifetime per KwH production cost of about 6.2 cents per kwH.

Given the above, the proposed LGE/KU Shared Solar monthly cost of at least 21 cents per KwH for the Solar Subscription is excessive and unreasonable as it proposes to charge Subscribers three to four times the going market rate for residential or commercial solar in the state of Kentucky.

A reasonable operating margin for LGE/KU for this specific energy would be close to their current standard residential rate for electricity, which is about 9 cents per kwH. Their proposed rates for this program are very unfair to any customer who chooses to participate in such, and are unjustified.

Solar power is a rapidly growing source of power production nationwide and globally. This proposed Shared Solar rate does not enable quick enough or fair enough implementation of such within KY.

Linton Wells, 201 Wildcat Drive, Richmond, KY 40475

\*Honorable Allyson K Sturgeon Senior Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202 \*Sara Veeneman LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

\*Honorable W. Duncan Crosby III Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KENTUCKY 40202-2828

\*Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

\*Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202

\*Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

\*Honorable Kurt J Boehm Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202

\*Honorable Kendrick R Riggs Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KENTUCKY 40202-2828

\*Honorable Michael L Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202

\*Rick E Lovekamp Manager - Regulatory Affairs LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202