

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	CASE NO.
UTILITIES COMPANY FOR AN ADJUSTMENT)	2018-00294
OF ITS ELECTRIC RATES)	

ORDER

The matter is before the Commission upon a letter request submitted by Kentucky Utilities Company (KU) seeking a deferral of the company's submission of its next RTO Membership Analysis and to submit such analysis in its 2021 Integrated Resource Plan (IRP) filing. In the April 30, 2019 Order (Final Order) in this matter, KU was directed to update its RTO Membership Analysis annually and to submit such updates to the Commission as part of its annual report, which is due by March 31st of each year. According to the schedule set in Case No. 2018-00348,¹ which involved KU's most recent IRP filing, KU will file its next IRP no later than October 19, 2021. Also in Case No. 2018-00348, Commission Staff recommended that, in the next IRP, KU should provide updated comprehensive and detailed cost-benefit studies comparing the full costs of joining PJM Interconnection, LLC or Midcontinent Independent System Operator, Inc. and all potential benefits such as increased revenues, lower reserve margin requirements, and improved reliability versus operating under its existing construct. KU now requests to modify the schedule for the RTO Membership Analysis to defer the March 31, 2021 filing to be concurrent with the 2021 IRP filing and to reduce the frequency

¹ Case No. 2018-00348, *Electronic 2018 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company* (Ky. PSC Oct. 2, 2020).

of the reports from annually to approximately every three years, concurrent with the IRP filing. KU asserts that filing the RTO Membership Analysis annually and with its IRP is an inefficient use of resources that serves no public purpose. KU further asserts that an outdated analysis should not be part of the IRP filing, such that removing the requirement to file an updated analysis with the IRP in favor of annual filings would be counterproductive.

Having reviewed the request and being otherwise sufficiently advised, the Commission finds that KU has established good cause to permit a revision as to when KU should file its RTO Membership Analysis. Rather than filing such analysis annually as part of its annual report and in conjunction with its IRP filings, the Commission finds that KU should file the analysis annually by March 31st in the post-case correspondence file of its most recent, or current, rate case. However, in the year in which KU is required to file an IRP, KU should file the analysis in conjunction with its IRP. The Commission further finds that KU should also submit its most recent RTO Membership Analysis with each future rate case until directed otherwise.

IT IS HEREBY ORDERED that:

1. KU's request for a deferral of the company's submission of its next RTO Membership Analysis and to submit such analysis in its 2021 IRP is granted to the extent that KU shall file the analysis annually by March 31st in the post-case correspondence file of its most recent, or current, rate case. However, in the year in which KU is required to file an IRP, KU shall file the analysis in conjunction with its IRP.

2. KU shall also file its most recent RTO Membership Analysis with each future rate case until directed otherwise.

3. All other provisions of the Final Order remains in full force and effect.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

By the Commission



ATTEST:

A handwritten signature in blue ink that reads "Linda C. Bidwell". The signature is written in a cursive style.

Executive Director

*Allyson K Sturgeon
Senior Corporate Counsel
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

*G. Houston Parrish
Labor Law Attorney
Office of the Staff Judge Advocate, B
50 3rd Avenue
Fort Knox, KENTUCKY 40121

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*William H May, III
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*Hannah Wigger
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Barry Alan Naum
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

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

*Laurence J Zielke
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

*Carrie H Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NORTH CAROLINA 27103

*Janice Theriot
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

*Mark E Heath
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WEST VIRGINIA 25301

*Carrie M Harris
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

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

*Don C A Parker
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

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

*Honorable Matthew R Malone
Attorney at Law
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*Emily W Medlyn
General Attorney
U.S. Army Legal Services Agency Regul
9275 Gunston Road
Fort Belvoir, VIRGINIA 22060

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

*Paul Werner
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Rebecca W Goodman
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Honorable Robert C Moore
Attorney At Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Robert M Conroy
Director, Rates
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

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

*Terrance A Spann
U.S. Army Legal Services Agency
9275 Gunston Road
ATTN: JALS-RL/IP
Fort Belvoir, VIRGINIA 22060-554

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507