



# Kentucky Interfaith Power & Light

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March 2, 2021

Kentucky Public Service Commission  
211 Sower Blvd  
Frankfort, KY 40601

RECEIVED

Re: PSC Case Number 2020-00350 (LG&E) and 2020-00349 (KU).

MAR 11 2021

Dear Commissioners,

PUBLIC SERVICE  
COMMISSION

Kentucky Interfaith Power & Light is submitting a comment to be entered into the record on these important issues. Kentucky IPL serves congregations, faith-based organizations, and individuals of faith responding to climate change as an ethical and moral issue. **From raising the utility costs to creating barriers for net metering to the racial and economic justice issues, we strongly believe the proposals from LG&E and KU are harmful to the communities we serve and will have a negative impact on faith communities.** Now is not the time to be raising energy bills and taking away access to solar energy. These proposed changes will hurt customers with low and fixed-incomes. As people of faith, we are called to care for our planet and for our neighbors. We believe that these changes brought before the Commission do not align with our values. Instead of granting the fixed rate raise and slashing the value of credit from solar energy, we believe that the Public Service Commission should require LG&E and KU to offer Kentuckians better tools to manage our energy bills and more financing options for late payments, as well as reject the solar proposals.

**Utility Costs.** At this time when so many Kentuckians are unemployed or have lost income and are facing disconnections and evictions because of the pandemic, the utilities and their investors should not deepen the pain. In Kentucky, a statewide moratorium on utility shut offs ended on October 20, 2020. Less than three months later - LG&E and KU have reported issuing more than 160,000 disconnect notices due to lack of payment. And they now want to raise the charges for disconnections and reconnections. It is important to our organization that we recognize when Kentuckians are hurting. *Now is not the time for a rate increase that will only make economic hardship much worse.*

**Racial/Economic Justice.** These proposals are unfair from an economic and racial justice perspective. In this proposal, LG&E and KU are continuing the trend of shifting a greater share of the overall bill to a fixed meter fee, a practice which is unfair for a number of reasons. For starters, customers with low and fixed-incomes generally use less energy. Charging all households a higher fixed fee has a disproportionate impact



on people living in smaller homes and apartments and all people who attempt to manage their bills by conserving energy; their bills will rise significantly no matter how little energy they use. Additionally, neighborhoods where housing is more dense have more meters. Thus, when a greater proportion of one's bill is a fixed meter fee, the people who are living in areas with high density housing, (which often tend to be lower income and racially segregated), are essentially subsidizing the utility expenses of those living in more geographically dispersed areas with fewer meters, (which tend to be higher income and whiter). *As an organization, we believe in centering the voices of those most impacted by climate change and environmental injustice. Targeted communities - communities of color and low-income communities - will be negatively impacted the most by the fixed rate.*

**Net metering.** Net metering is an important service that utilities offer to customers that must be preserved. As an organization that works with houses of worship on conservation, efficiency and alternative energy, we know that many of the congregations in Kentucky are turning to net metering as a way to care for God's creation. The value of solar energy in Kentucky is an important factor that should be taken into consideration for future changes to the net metering rate structure. Solar energy has provided a benefit to the utilities for some time now. The value that distributed solar brings to the utilities should be taken into consideration in future decisions about net-metering rate changes and any concerns about adverse economic impacts should realize that the 1% cap (put in place in 2005) has already insured that will be insignificant. The congregations we have helped guide through solar energy do so to help care for God's creation and create healthy communities for all people in the state and for generations to come.

In order to prevent utility and solar customers from being taken advantage of, we believe that the Public Service Commission should require LG&E / KU to offer Kentuckians better tools to manage our energy bills. The PSC should require the utilities to provide customers with Pay-As-You-Save financing options for energy efficiency, along with other well-designed energy efficiency programs. LG&E / KU should also be required to continue the moratorium on disconnections/late fees for the duration of the pandemic, and to offer options like payment plans or debt forgiveness for customers who cannot afford their accumulating bills. For the net metering proposal, Kentucky IPL firmly believes that solar helps small businesses, nonprofits, churches and homeowners to save money and make sustainable choices for their future that are in line with their values as people of faith. Without a 1:1 net metering credit, investing in solar would be out of reach for most people. Instead of changing the 1:1 rate, the Commission should implement and support state policies that help make solar even more accessible.

We are making these comments with the full support of our organization. Thank you for consideration.

Sincerely,



The Rev. Dawn Cooley  
Executive Director, Kentucky IPL



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