

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: case numbers 2020-00349, 2020-00350 and 2020-00174
Date: Wednesday, March 17, 2021 10:05:00 AM

Thank you for your comments on the application of Kentucky Utilities Company and Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case numbers in this matter, 2020-00349 and/or 2020-00350, in any further correspondence. The documents in these cases are available at [View Case Filings for: 2020-00349 \(ky.gov\)](#) and [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Tuesday, March 16, 2021 9:48 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: case numbers 2020-00349, 2020-00350 and 2020-0074

From: Cathy Lerza [REDACTED]
Sent: Sunday, March 14, 2021 1:20 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: case numbers 2020-00349, 2020-00350 and 2020-0074

I am writing regarding case numbers 2020-00349, 2020-00350 and 2020-0074. Please do not allow the requested reduction in credit paid for roof-top solar power or KPC drop in service area.

The proposed reductions would undermine the intent of the law to protect customer choice. They would also eliminate the financial incentive for Kentucky rooftop solar development.

A viable rooftop solar industry is needed to:

1. Allow citizens to participate in energy transition to zero greenhouse gas emissions to address the climate crisis while at the same time controlling some of their energy costs.
2. Maintain or enhance Kentucky's competitiveness to attract businesses where employees can utilize affordable rooftop solar the same as 30 other net metering friendly states/
3. Allow an off the grid energy source especially as battery storage capacity improves. The off the grid source is very useful in power outages and peak power demands.

Thank you for considering these concerns.

Cathy Lerza



From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: case numbers KU2020-00349, LG&E 2020-00350, KPC 2020-00174
Date: Wednesday, March 17, 2021 10:08:00 AM

Thank you for your comments on the application of Kentucky Utilities Company and Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case numbers in this matter, 2020-00349 and/or 2020-00350, in any further correspondence. The documents in these cases are available at [View Case Filings for: 2020-00349 \(ky.gov\)](#) and [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Tuesday, March 16, 2021 9:35 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: case numbers KU2020-00349, LG&E 2020-00350, KPC 2020-0074

From: Janet1 [REDACTED]
Sent: Friday, March 12, 2021 3:10 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Re: case numbers KU2020-00349, LG&E 2020-00350, KPC 2020-0074

To Members of the KY Public Service Commission
Re: case numbers KU2020-00349, LG&E 2020-00350, KPC 2020-0074
I write with regard to the letter to the editor by Henry Jackson in today's Lexington Herald-Leader.
I am in my seventies and am not able to install solar panels on our home. But if able, I would certainly do so. Anything that individuals can do to lessen reliance on the rest of the community for survival basics seems to me a good thing. The more independent I can be about caring for myself, the more community resources can be used for those individuals who have suffered misfortunes, abuse, neglect, etc.
Mr. Jackson's views on the requested reduction in the KU/LG&E credit paid for rooftop solar power and a 75% drop in the KPC service area sound quite responsible to me. The requested actions would discourage customers to continue to rely on the utilities more than is necessary. Why inhibit individuals from producing their own power and controlling their energy costs? Isn't it recommended that people budget for events and expenses wisely, not wastefully?
Well, I've lived long enough to know that Mr. Jackson is correct about how these restrictions would dampen further job growth in the solar industry. I endorse his three recommendations

for maintaining a viable rooftop solar industry in Kentucky.
Retain the current net metering rate of compensation and help grow the rooftop solar industry.
We need the jobs.

I think those at KU, LG&E, and KPC requesting these reductions are just trying to keep more profit in their own bank accounts. I'm sure that if you would check on the contrast between the average worker pay at KU, LG&E, and KPC and that of their CEOs and other top executives, you would see that the utilities are well-off and truly don't need the reductions and drops.

JANET PIECHOWSKI (*Pe-ah'-ski*)

3451 Saybrook Rd.

Lexington, KY 40503

Cell

[REDACTED]

Home

[REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: KU Case Number 2020-00349 and LG&E Case Number 2020-00350
Date: Wednesday, March 17, 2021 10:04:00 AM

Thank you for your comments on the application of Kentucky Utilities Company and Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case numbers in this matter, 2020-00349 and/or 2020-00350, in any further correspondence. The documents in these cases are available at [View Case Filings for: 2020-00349 \(ky.gov\)](#) and [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Tuesday, March 16, 2021 9:55 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: KU Case Number 2020-00349 and LG&E Case Number 2020-00350

From: Dominique Olbert [REDACTED]
Sent: Monday, March 15, 2021 5:08 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: KU Case Number 2020-00349 and LG&E Case Number 2020-00350

Re: KU Case Number 2020-00349 and LG&E Case Number 2020-00350

To Whom It May Concern:

My name is Dominique Olbert and I am the president of the Community Response Coalition of Kentucky, a nonprofit that helps immigrants. During the pandemic, we have been helping clients pay their utility and rent bills, especially if they have a

household member with Covid. I am writing to you to share that KU and LG&E's attempts to raise basic rates would have an extremely negative impact on our clients who are already very financially insecure.

Our clients are almost all immigrants who are currently having financial difficulties, either because of Covid-related issues or because of life circumstances that have left them unable to pay their bills in a timely way. While helping them pay their current bills, we encourage them to lower their energy use as much as possible, to keep their bills affordable. Raising their basic rate would have a disproportionately negative impact on our clients. They can lower the heat or turn off the lights to live within their means, but they can't lower basic rates. This raise in rate would be inequitable as it would impact people of limited means much more strongly than others.

Raising basic rates is in the middle of a pandemic when people who are housing insecure are already struggling to pay their bills seems particularly tone deaf, as well as potentially very difficult for our clients. I urge you not to approve this increase.

Sincerely,

Dominique Olbert
President, CRCKY

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From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: KU:2020-00349, LG&E: 2020-00350, KPC:2020-00174
Date: Wednesday, March 17, 2021 10:07:00 AM

Thank you for your comments on the application of Kentucky Utilities Company and Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case numbers in this matter, 2020-00349 and/or 2020-00350, in any further correspondence. The documents in these cases are available at [View Case Filings for: 2020-00349 \(ky.gov\)](#) and [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Tuesday, March 16, 2021 9:41 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: KU:2020-00349, LG&E: 2020-00350, KPC:2020-0074

From: Bonita Rose <[REDACTED]>
Sent: Saturday, March 13, 2021 3:45 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: KU:2020-00349, LG&E: 2020-00350, KPC:2020-0074

This message is in opposition to above electric utilities request for changes in solar power credits, etc. This is an attempt to:

- 1) totally monopolize eclectic power.
- 2) take away rights of the individual
- 3) ignore democracy in the face of strong public opinion
- 4) choose short term profit over long term welfare of Kentucky

Please, KY Public Service Commission, allow kentuckians to grow and progress into the 21st Century. Don't tie our hands so we regress into more poverty and backward thinking. If need be, look to other states that have achieved a compromise that still allows progress towards individual rights and clean power.

Thank you for your consideration.

Bonita Rose

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: 2020-00350
Date: Wednesday, March 17, 2021 10:24:00 AM

Thank you for your comments on the application of Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00350, in any further correspondence. The documents in this case are available at [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Tuesday, March 16, 2021 9:57 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: 2020-00350

-----Original Message-----

From: Paula Fox <[REDACTED]>
Sent: Tuesday, March 16, 2021 11:33 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: LG&E Proposed Rate Increase

We all realize companies have taken a hit during the pandemic, but a rate increase at this time with create an even bigger hit on your customers. Please reconsider an increase; customers need a chance to get back on their feet.

Thank you,
P. M. Fox
6604 Willowrun Lane
Please Valley, KY 40056

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: 2020-00350
Date: Wednesday, March 17, 2021 10:27:00 AM

Thank you for your comments on the application of Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00350, in any further correspondence. The documents in this case are available at [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Tuesday, March 16, 2021 9:33 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: 2020-00350

From: Lisa Schoenbachler [REDACTED]
Sent: Friday, March 12, 2021 12:23 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Proposed rate hike

I am Lisa Schoenbachler, long-time LG&E customer and supporter of clean energy initiatives. This is wrong for so many reasons - mainly that it dis-incentives people to go solar and increases price on the tail-end of the pandemic that disrupted so many people's lives.

1) It's wrong to jack up rates and disconnect fees when so many people are hurting.

KU's proposal will raise the average residential electric bill by \$12.85 / month, and increase its fees for disconnection by \$9.00. LG&E's proposal will increase the average residential electric bill by \$11.74 / month, and the average residential gas bill by \$6.17 / month. LG&E's disconnect fees will increase by \$4.00 for gas customers and another \$4.00 for electric service. This is the third rate increase sought by LG&E/KU in the last four years.

2) LG&E / KU's proposal is unfair to low-income folks and communities of color.

The companies propose to increase people's bills mostly by raising the basic monthly service

charge, a flat per-meter fee that customers pay regardless of how much energy they use. For KU customers, the service charge will become \$18.60 per month, around a 15% increase. For LG&E electricity the new flat fee will be \$15.80 per month, and for gas it will be \$23.72 per month. These proposed per-meter fees are more than double what KU customers paid nine years ago, and nearly double what LG&E customers paid in 2012.

This approach to rate design – shifting a larger share of each person’s monthly bill to the flat charge – means folks’ bills rise significantly no matter how little energy they use. It unfairly harms low-income customers, people of color, folks who live in smaller apartments and homes, and others who seek to manage their bills by using less energy. Putting most of the rate increase on a flat per-meter charge also means that neighborhoods with a higher density of apartments and houses are essentially subsidizing the utility’s costs for providing service in suburban or wealthier – and often whiter – neighborhoods, which have fewer meters over a larger area.

3) LG&E and KU also seek to rig the rules so only they can benefit from low-cost solar.

The utilities’ plan threatens the future of locally-owned rooftop solar by slashing by nearly 80% the value of the credit a customer gets for each kWh of solar energy provided to the grid. The justification for this change is not supported by evidence, and would ruin the economic value of rooftop solar for new solar customers. It’s part of a larger trend by utilities to re-write the rules so their customers can’t benefit from increasingly low-cost solar panels. The Public Service Commission should reject the utility's net-metering proposal and replace it by using a fair methodology and a full accounting of the costs and benefits of distributed energy.

4) The KY Public Service Commission should hold accessible public hearings.

The PSC should schedule and hold multiple hearings so customers can make their voices heard about LG&E / KU’s proposals. The dates and times for these events should be publicized widely and the public should be given at least three weeks of advance notice.

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: Case No 2020-00350 - COMMENT
Date: Wednesday, March 17, 2021 10:26:00 AM
Attachments: [LGE Rates COMMENT LETTER Final Mar 2021.pdf](#)

Thank you for your comments on the application of Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00350, in any further correspondence. The documents in this case are available at [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Tuesday, March 16, 2021 9:49 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: Case No 2020-00350 - COMMENT

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

From: Wallace McMullen [REDACTED]
Sent: Sunday, March 14, 2021 4:20 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case No 2020-00350 - COMMENT

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

Kentucky Public Service Commission
Sent by email to psc.info@ky.gov

Re: Case No 2020-00350

March 13, 2021

Dear Commissioners:

We, the Green Sanctuary Committee of the All Peoples Unitarian Universalist Congregation, are writing to oppose the proposed rate change application submitted by LG&E, which we believe has been inappropriately submitted during the time of the COVID 19 crisis.

The Green Sanctuary Committee of All Peoples Unitarian Universalistie Congregation is dedicated to “justice, equity and compassion in human relations” and therefore, seeks to oppose actions that create unfair and onerous costs for those who can least afford them.

We observe that the number and percent of households unable to pay their LG&E bills has risen dramatically in the past year. This rise is estimated in the thousands in news stories. When the problem of inability to pay for utilities increases this much, it requires a different and more aggressive problem solving approach than the usual approach of just shaving down a utility company’s typical request for additional revenue. This proceeding should not be approached as just another rate case.

The standard the PSC should be implementing is to only allow payment for the most immediate activities required to maintain vital services of LG&E. For example, million dollar salaries for executives should be examined very critically, and perhaps disallowed.

Suggested APPROPRIATE ACTIONS BY THE PSC:

- Stop transferring a growing percentage of the cost of utilities into the mandatory Basic Service Charge.
- Use a racial and income equality lens in reviewing all proposed actions.
- Fully scrutinize any proposed capital expenses.

MANDATORY ‘NO SERVICE’ FEE

LG&E wants to charge all residential customers with electric and gas service \$1.30 a day for their mandatory connection fee (misnamed a Basic Service fee, but providing no service) before providing any electricity or natural gas. This is a charge of \$0.78 per day for gas, and \$0.52 per day for electricity. This is \$474 a year that presumably guarantees the Company a profit, but mostly is an exploitation of the dense housing areas in their service territory. It has negative impacts on the customers. The mandatory ‘basic service’ charge should be repealed.

THE PROPOSED ALLOCATION OF COSTS INDICATES USAGE IS IRRELEVANT AND UNDERMINES ALL ASSERTIONS THAT EFFICIENCY IS IMPORTANT

It has long been the underlying principle of utility service that controlling excessive usage is a public good.

The transfer of costs from usage charges to a mandatory Basic Service Charge creates an inflexible payment demand that cannot be controlled by the user.

THE PROPOSED ALLOCATION OF COSTS HAS A DISPARATE IMPACT BY RACE,

The segregation of Louisville by race is well documented. The Louisville zoning regulations herd Black households into small geographies by allowing small lot sizes only in predominately black or lower-income neighborhoods, and by only allowing multi-family rental housing units (66% of Black households rent compared to 30% of White households in Louisville) in those same black or lower-income neighborhoods. Closely compacted lots and multi-family rental housing units are prohibited by law in the more prosperous eastern Jefferson County

By transferring a significant percent of cost of utilities into the mandatory Basic Service Charge, LG&E is disparately bleeding the dense census tracts of Black households to subsidize utility services to widely dispersed White areas. This has the effect of taking money from low-income households to provide service to high income households, and of taking money from black neighborhoods to serve white neighborhoods. Please disallow the request in the rate application, and reverse the trend of transferring charges from usage to the mandatory Basic Service Charge.

THE PROPOSED ALLOCATION REDUCES LOCAL RESILIENCE, UNDERMINES HOMELAND SECURITY AND IS AN UNDUE EXERCISE OF MONOPOLY POWER

By transferring the percentage of cost of utilities to the mandatory inflexible Basic Service Charge, instead of keeping costs linked to usage, LG&E is lessening the incentives for individuals and small businesses to create distributed solar power. The proposed decrease in pay to local producers of energy ~~LG&E is proposing~~ is a transparent discouragement of local small production. But there is more resilience if local distributed production of energy is financially encouraged.

The value of less dependence on a large centralized, vulnerable grid has just been demonstrated in Texas, and the discouragement of small individual producers is an abuse of monopoly power by LG&E. Further, it undermines Homeland Security and local resilience in any attack or weather related damage to major systems.

THE AMOUNTS REQUESTED ARE ONEROUS

Adding on an application for a 13% residential rate hike for the electricity LG&E does provide in the time of a pandemic is also exploitative and onerous. At a time when the customers have to tighten their belts because unemployment is at record levels, and multiple economic sectors are almost totally shut down, raising the rates for customers appears unscrupulous and unwise. It will only contribute to more unpaid bills. The Commission should disallow this application for a large rate increase.

Even more extreme is the requested increase in the natural gas distribution charge. The legal notice printed in the Courier-Journal shows that they have requested an increase from 36.782 cents per 100 cubic feet to 48.398 cents per 100 cubic feet of delivered gas. This is a requested increase of 31.6%. Outrageous in a pandemic!

Social Security payments have risen only about 10% in the past seven years. Yet LG&E wants a 31% increase in gas distribution charges in just one year! No one can be surprised that lower income people are unable to pay such charges. This rate increase request also

appears unscrupulous, exploitative, and onerous. It should be denied.

THE PROPOSED CAPITAL EXPENSE INCLUDES EXPENDITURES THAT ARE USELESS TO PEOPLE WITH LOW INCOMES

Although the experience of public schools with remote learning has clearly shown that there is not equal access to the internet, LGE still proposes a major capital expense for Advanced Meters, which depend on the internet for any feedback (feedback of dubious value in any case). Why should poor people, disproportionately Black, disproportionately LatinX or disproportionately female-headed households with children – all of whom, it has been shown, lack easy and affordable access to the internet - pay for metering toys for wealthier households that depend on information delivered through the internet? And the lower-income customers will pay a premium as those ‘advanced’ gadgets will be charged as capital expenses that give LG&E additional recorded ‘investment’ for more ‘return on investment’ in the future.

LG&E has taken the position that usage has become far less relevant to the cost of utilities, as they seek to transfer an ever larger percent of the cost of utilities to the mandatory Basic Service Charge from usage. But at the same time LG&E argues it is important to let people know their usage through ‘Advanced Meters’ so customers can possibly figure out ways to reduce usage. This seems deceptive at the very least. The ‘advanced meters’ expense should be disallowed, both now and in 2026 (which is when the Company proposes to start billing for the devices).

THE PUBLIC SERVICE COMMISSION SHOULD REQUIRE LG&E TO OFFER CUSTOMERS BETTER TOOLS TO MANAGE UTILITY BILLS.

LG&E has cancelled almost all efficiency programming for residential customers. The PSC should require the utilities to provide customers with reasonable options for efficiency choices, which could enable reduced usage for financially strapped customers. Customers becoming more efficient incorporates substantial **non-energy benefits**, such as reduced pollution, reduced transmission line losses, and less cost for future generation equipment.

MORATORIUM ON DISCONNECTIONS

LG&E and 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 during this Covid crisis. We now have hope that the economy can return to “normal” in a number of months. Customers should be allowed options that forgive periods of financial stress due to pandemic unemployment or underemployment.

LG&E / KU’S PROPOSED CHANGES TO SOLAR NET METERING WILL UNDERMINE THE MARKET FOR ROOFTOP SOLAR, DISCOURAGING CUSTOMERS FROM INVESTING IN SOLAR AND KNEE-CAPPING LOCAL SOLAR BUSINESSES.

The utilities propose to reduce the value of solar energy supplied to the grid by more than 75% - from the current retail rate of 10 cents/kWh to 2.2 cents/kWh. Devaluing solar energy in this way (without evidence that it is fair, just, or reasonable, and without a comprehensive accounting for the benefits rooftop solar provides to the utility and ratepayers) will put rooftop solar out of reach for many households, nonprofits, and small businesses, and choke off our growing solar businesses. THESE CHANGES SHOULD BE REJECTED.

The PSC has hired a consultant to help them decide on new net metering rates for utilities and is still considering Kentucky Power Company's proposed changes to net metering.

The Commission should defer consideration of LG&E/KU's proposed changes to net metering until the agency's own work with the consultant in the Kentucky Power Company case is complete. Any process for designing and approving new rates for net-metered solar should include a full and rigorous evaluation of the costs **and the benefits** of rooftop solar in Kentucky.

To determine what would be a fair net metering credit for rooftop solar, the PSC along with their consultant should consider:

- a. The benefits of solar technology and the best practices developed by other states to determine a just compensation rate for solar net metering. This includes taking into account the overlap between solar peak production and peak energy demand, reduced line loss and wear and tear on the grid, avoided infrastructure investments, and health and environmental benefits. Using an avoided-cost rate, as LG&E / KU wants to do, does not account for these obvious benefits.
- b. Solar helps small businesses, nonprofits, churches and homeowners to save money and make smart choices for their future. Without a 1:1 net metering credit, investing in solar may be out of reach for most people. Instead of changing the 1:1 rate, LG&E / KU and the Commission should implement and support state policies that help make solar more accessible, such as third-party ownership, virtual net metering, net metering credit transfer, expansion of energy efficiency programs, stable fixed cost rates, and on-bill financing.
- c. Any change to how distributed solar is to be credited should also be easy to understand and administer and provide long-term stability for customers to make sound financial decisions about whether and when to invest in rooftop solar. The current net metering proposals are extremely difficult to understand, and further, the new proposed credit was not presented in the Notice to Customers.

All Peoples Unitarian Universalist Congregation has invested in solar power. We want to mitigate climate change – enough to put our own money into purchasing a rooftop solar system. We want to help move our economy to a carbon-free system. Please consider these comments as coming from a congregation which holds these ideas as fundamental to how we relate to the world.

Thank you for considering our comments.

All Peoples Green Sanctuary Committee

Martha Flack, Chair
Debby Sublett
Wallace McMullen
Dennis Neyman
Diane Guenther
Margaret Fry
Tony Sweazy

-my regards,
Wallace McMullen

Kentucky Public Service Commission
Sent by email to psc.info@ky.gov

Re: Case No 2020-00350

March 13, 2021

Dear Commissioners:

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By transferring the percentage of cost of utilities to the mandatory inflexible Basic Service Charge, instead of keeping costs linked to usage, LG&E is lessening the incentives for individuals and small businesses to create distributed solar power. The proposed decrease in pay to local producers of energy ~~LG&E is proposing~~ is a transparent discouragement of local small production. But there is more resilience if local distributed production of energy is financially encouraged.

The value of less dependence on a large centralized, vulnerable grid has just been demonstrated in Texas, and the discouragement of small individual producers is an abuse of monopoly power by LG&E. Further, it undermines Homeland Security and local resilience in any attack or weather related damage to major systems.

THE AMOUNTS REQUESTED ARE ONEROUS

Adding on an application for a 13% residential rate hike for the electricity LG&E does provide in the time of a pandemic is also exploitative and onerous. At a time when the customers have to tighten their belts because unemployment is at record levels, and multiple economic sectors are almost totally shut down, raising the rates for customers appears unscrupulous and unwise. It will only contribute to more unpaid bills. The Commission should disallow this application for a large rate increase.

Even more extreme is the requested increase in the natural gas distribution charge. The legal notice printed in the Courier-Journal shows that they have requested an increase from 36.782 cents per 100 cubic feet to 48.398 cents per 100 cubic feet of delivered gas. This is a requested increase of 31.6%. Outrageous in a pandemic!

Social Security payments have risen only about 10% in the past seven years. Yet LG&E wants a 31% increase in gas distribution charges in just one year! No one can be surprised that lower income people are unable to pay such charges. This rate increase request also appears unscrupulous, exploitative, and onerous. It should be denied.

THE PROPOSED CAPITAL EXPENSE INCLUDES EXPENDATURES THAT ARE USELESS TO PEOPLE WITH LOW INCOMES

Although the experience of public schools with remote learning has clearly shown that there is not equal access to the internet, LGE still proposes a major capital expense for Advanced Meters, which depend on the internet for any feedback (feedback of dubious value in any case). Why should poor people, disproportionately Black, disproportionately LatinX or disproportionately female-headed households with children – all of whom, it has been shown, lack easy and affordable access to the internet - pay for metering toys for wealthier households that depend on information delivered through the internet? And the lower-income customers will pay a premium as those 'advanced' gadgets will be charged as capital expenses that give LG&E additional recorded 'investment' for more 'return on investment' in the future.

LG&E has taken the position that usage has become far less relevant to the cost of utilities, as they seek to transfer an ever larger percent of the cost of utilities to the mandatory Basic Service Charge from usage. But at the same time LG&E argues it is important to let people know their usage through 'Advanced Meters' so customers can possibly figure out ways to reduce usage. This seems deceptive at the very least. The 'advanced meters' expense should be disallowed, both now and in 2026 (which is when the Company proposes to start billing for the devices).

THE PUBLIC SERVICE COMMISSION SHOULD REQUIRE LG&E TO OFFER CUSTOMERS BETTER TOOLS TO MANAGE UTILITY BILLS.

LG&E has cancelled almost all efficiency programming for residential customers. The PSC should require the utilities to provide customers with reasonable options for efficiency choices, which could enable reduced usage for financially strapped customers. Customers becoming more efficient incorporates substantial **non-energy benefits**, such as reduced pollution, reduced transmission line losses, and less cost for future generation equipment.

MORATORIUM ON DISCONNECTIONS

LG&E and 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 during this Covid crisis. We now have hope that the economy can return to "normal" in a number of months. Customers should be allowed options that forgive periods of financial stress due to pandemic unemployment or underemployment.

LG&E / KU'S PROPOSED CHANGES TO SOLAR NET METERING WILL UNDERMINE THE MARKET FOR ROOFTOP SOLAR, DISCOURAGING CUSTOMERS FROM INVESTING IN SOLAR AND KNEE-CAPPING LOCAL SOLAR BUSINESSES.

The utilities propose to reduce the value of solar energy supplied to the grid by more than 75% - from the current retail rate of 10 cents/kWh to 2.2 cents/kWh. Devaluing solar energy in this way (without evidence that it is fair, just, or reasonable, and without a comprehensive accounting for the benefits rooftop solar provides to the utility and ratepayers) will put rooftop solar out of reach for many households, nonprofits, and small businesses, and choke off our growing solar businesses. **THESE CHANGES SHOULD BE REJECTED.**

The PSC has hired a consultant to help them decide on new net metering rates for utilities and is still considering Kentucky Power Company's proposed changes to net metering. The Commission should defer consideration of LG&E/KU's proposed changes to net metering until the agency's own work with the consultant in the Kentucky Power Company case is complete. Any process for designing and approving new rates for net-metered solar should include a full and rigorous evaluation of the costs **and the benefits** of rooftop solar in Kentucky.

To determine what would be a fair net metering credit for rooftop solar, the PSC along with their consultant should consider:

- a. The benefits of solar technology and the best practices developed by other states to determine a just compensation rate for solar net metering. This includes taking into account the overlap between solar peak production and peak energy demand, reduced line loss and wear and tear on the grid, avoided infrastructure investments, and health and environmental benefits. Using an avoided-cost rate, as LG&E / KU wants to do, does not account for these obvious benefits.
- b. Solar helps small businesses, nonprofits, churches and homeowners to save money and make smart choices for their future. Without a 1:1 net metering credit, investing in solar may be out of reach for most people. Instead of changing the 1:1 rate, LG&E / KU and the Commission should implement and support state policies that help make solar more accessible, such as third-party ownership, virtual net metering, net metering credit transfer, expansion of energy efficiency programs, stable fixed cost rates, and on-bill financing.
- c. Any change to how distributed solar is to be credited should also be easy to understand and administer and provide long-term stability for customers to make sound financial decisions about whether and when to invest in rooftop solar. The current net metering proposals are extremely difficult to understand, and further, the new proposed credit was not presented in the Notice to Customers.

All Peoples Unitarian Universalist Congregation has invested in solar power. We want to mitigate climate change – enough to put our own money into purchasing a rooftop solar system. We want to help move our economy to a carbon-free system. Please consider these comments as coming from a congregation which holds these ideas as fundamental to how we relate to the world.

Thank you for considering our comments.

All Peoples Green Sanctuary Committee

Martha Flack, Chair

Debby Sublett
Wallace McMullen
Dennis Neyman
Diane Guenther
Margaret Fry
Tony Sweazy

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: 2020-00350 LG&E
Date: Wednesday, March 17, 2021 10:24:00 AM

Thank you for your comments on the application of Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00350, in any further correspondence. The documents in this case are available at [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: kristopher kelley [REDACTED]
Sent: Monday, March 15, 2021 5:20 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: 2020-00350 LG&E

To Whom It May Concern,

I am writing to encourage the commission to deny LG&E's request to change net metering rates. This change would make rooftop solar unfeasible in Kentucky. The current system where you receive a credit for each kWh equal to what you pay for electricity is fair. I am wanting to install solar panels on the roof of my business at 1132 East St. Catherine Street, Louisville, KY 40204, but I cannot do this if this change in net metering is allowed. Please do not disincentivize renewable energy production by allowing LG&E to change their net metering rates.

Thank you,

Kristopher Kelley

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: In reference to Case Number: 2020-00350
Date: Wednesday, March 17, 2021 10:24:00 AM

Thank you for your comments on the application of Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00350, in any further correspondence. The documents in this case are available at [View Case Filings for: 2020-00350 \(ky.gov\)](#).

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Briana Frederick [REDACTED]
Sent: Monday, March 15, 2021 4:31 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: In reference to Case Number: 2020-00350

In reference to Case Number: 2020-00350
Dear Public Service Commission members,

My name is Briana Frederick and I am the supporting half of the small business Empower Solar LLC in Louisville, KY. Family owned and operated by my husband Josh, residential solar is our livelihood. While just a drop in the pool of energy production in Kentucky, his work supports our entire household, some part time workers and electricians. There is much interest in and demand for solar in Louisville and we have the capability to hire more help and get more installed. However, if the rate case put forth by LG&E is approved, our residential solar business will evaporate in June. While so many in the community are facing job loss, housing instability and worse due to covid, solar is an industry booming everywhere and largely unaffected by covid. Now is not the time to crush a small business's ability to expand and support more families through good paying and ethical work. Now is also not the time to allow an 11.8% fixed rate increase to electric bills across the county while so many cannot afford their bills as they are. There are many ways to support both utilities and small business, and this measure only helps one. While commercial solar is still there, it's an entirely different animal and requires a much different approach and infrastructure. Solar will power the future regardless of what you do now. The question is whether you will support the growth of small business and ingenuity as it naturally grows in this industry in Kentucky or squash it as it stands, allowing the big utilities to build their own, and keep us further behind the times than ever before. We also request a public hearing for people to have an opportunity to make their voices heard.

If any of your members are still unsure about why and how this affects residential solar please watch the video below. We get these questions often from the community so we decided to answer them all

at once: <https://www.facebook.com/empowersolarlarky/videos/202127774989832/>

Thank you for your time and consideration of the public which you serve.

Briana Frederick, wife to Joshua Frederick, mother to Eldon, Arlo and Remy Frederick

Owners of Empower Solar LLC

8302 Tolls Ln.

Louisville, KY 40214

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Briana Frederick 

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