

RECEIVED

APR 28 2022

PUBLIC SERVICE
COMMISSION



LOUISVILLE METRO COUNCIL

April 19, 2022

Public Service Commission

Re: LG&E/KU 2021 Integrated Resource Plan, Case Filing 2021-00393

Louisville Metro Council is a 26-member legislative body representing the residents of Louisville/Jefferson County. As members representing districts 4, 9, 12, 21, 24, and 25 we are writing to urge the Public Service Commission (PSC) to consider Louisville Metro Resolution 009, Series 2020 which called for 100% clean, renewable electricity for municipal (LMG) operations by 2030, as they review LG&E/KU's 2021 Integrated Resource Plan.

We applaud LG&E/KU's investments in solar energy at the E.W. Brown Generating Station and hydroelectric at the Ohio Falls and Dix Dam. In addition, the Solar Share Facility in Simpsonville has seen 100% subscription from ratepayers in the first five sections of the array, a clear sign that customers are willing to invest in clean, renewable energy.

In addition, the research collaboration with the University of Kentucky Center for Applied Research on carbon capture at the E.W. Brown generating station is already showing great promise. It is one of the few energy plants in the country with an active carbon capture unit, which has lowered carbon capture costs by 40% so far. We look forward to future research endeavors that explore carbon capture at natural gas facilities.

However, according to the submitted IRP, LG&E/KU's energy mix will still be 80% fossil fuels by 2036. This does not align with our city's goal of 100% clean electricity for municipal operations by 2030 which was passed through resolution by Metro Council in February 2020. Nor does it align with the transition necessary to keep global warming below 1.5 degrees Celsius which the International Panel on Climate Change has reiterated is necessary to prevent catastrophic climate change effects¹. As we have seen throughout the nation, state, and even in our own city, climate change impacts are costly in both lives and dollars. Without a significant reduction in greenhouse gas emissions, the majority of which in Louisville come from electricity use, we will continue to see deadly and costly climate disasters.

In addition, with the phase out of fossil fuels, particularly coal, harmful emissions are reduced resulting in better public health outcomes, especially for those living near generating facilities. After the closure of the Cane Run Road site and the addition of scrubbers to the Mill Creek site, there was a resulting decrease in asthma-related hospitalizations and emergency room visits as well as fewer daily asthma symptoms in the nearby community, according to research published in the highly respected journal *Nature Energy* in 2020².

¹https://www.ipcc.ch/report/ar6/wg3/?fbclid=IwAR1WGXu_BfofNP-9t557g-DjH5shXsc7sjc8JcXg4ob61xHc2M1wCKO_Pyo

² Improved asthma outcomes observed in the vicinity of coal power plant retirement, retrofit and conversion to natural gas. 2020. Casey et al. *Nature Energy*. <https://www.nature.com/articles/s41560-020-0600-2>



LOUISVILLE METRO COUNCIL

The levelized cost of energy (LCOE) is a measure of the average net present cost of electricity generation for a generating plant over its lifetime. This allows for long-term comparisons of different types of energy generation. According to Forbes, the LCOE for utility-scale renewables is so much lower than coal or natural gas that building new clean energy generation is now cheaper than continuing to run existing coal plants³. Utilities across the country are retiring coal plants early due to the increasing cost of burning coal as well as the continuing drop in prices for utility-scale renewable energy⁴. We strongly recommend LG&E/KU model early closure of all coal-fired power plants as Duke Energy Carolinas, LLC and Duke Energy Progress, LLC did in their 2020 IRP⁵.

We are appreciative of the decades of reliable service that LG&E/KU have provided their customers and are confident that they can continue to fulfill their obligations and provide clean, renewable energy to power our homes, businesses, institutions, and houses of worship for many years to come.

Sincerely,

Councilman Jecorey Arthur – District 4

Councilman Bill Hollander – District 9

Councilman Rick Blackwell – District 12

Councilwoman Nicole George – District 21

Councilwoman Madonna Flood – District 24

Councilwoman Amy Holton Stewart – District 25

³ <https://www.forbes.com/sites/energyinnovation/2020/01/21/renewable-energy-prices-hit-record-lows-how-can-utilities-benefit-from-unstoppable-solar-and-wind/?sh=1496c142c84e>

⁴ <https://www.eenews.net/articles/nations-3rd-largest-utility-to-shut-down-half-of-coal-fleet/>

⁵ City of Charlotte Initial Comments on Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Integrated Resource Plan. <https://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=066d6aeb-73b6-45d8-817a-7cab0fe603d8>.