

**From:** [PSC Public Comment](#)  
**To:** [REDACTED]  
**Subject:** RE: PLS CONFIRM RECEIPT: Case 2021-00393  
**Date:** Monday, July 18, 2022 12:25:00 PM

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Case No. 2021-00393

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 number in this matter, 2021-00393, in any further correspondence. The documents in this case are available at [View Case Filings for: 2021-00393 \(ky.gov\)](#).

Thank you for your interest in this matter.

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**From:** Sarah Lynn Cunningham [REDACTED]  
**Sent:** Friday, July 15, 2022 3:23 PM  
**To:** Wilson, Karen L (PSC) <KarenL.Wilson@ky.gov>; PSC Public Comment <PSC.Comment@ky.gov>  
**Subject:** PLS CONFIRM RECEIPT: Case 2021-00393

**\*\*CAUTION\*\* PDF attachments may contain links to malicious sites. Please contact the COT Service Desk [REDACTED] for any assistance.**

Dear Ms. Wilson,

Please enter the attached letter -- on behalf of our 50 organizational members, 1,000+ subscribers and 1,300 social media followers -- into the formal record for the subject case. I apologize that it took us this long to submit it, but COVID recently took a big bite out of me.

Cooperatively,  
Sarah Lynn Cunningham, PE, Executive Director  
Louisville Climate Action Network  
[REDACTED]



15 July 2022

Kent A. Chandler, Chairperson  
Kentucky Public Service Commission

submitted via email (psc.info@ky.gov)

RE: Case #2021-00393 (LG&E-KU IRP)

Dear Mr. Chandler,

Thank you for the opportunity to speak to the Louisville Gas & Electric—Kentucky Utilities’ proposed Integrated Resources Plan (IRP).

The growing Louisville Climate Action Network (LCAN) now consists of 50 community and faith-based organizations, for-profit businesses and educational institutions, nearly all of whom are among LG&E-KU’s commercial-class customers, plus over 1,000 individual subscribers and almost 1,300 social media followers, overwhelmingly among their residential customers.

By burning coal and gas to produce 99% of the power it sells, LG&E-KU is emitting huge quantities of carbon pollution, making the subject case relevant, not just to their customers, but to everyone on our increasingly overheating planet. Smog-precursors and other pollutants in those power plants’ flue gases damage health throughout our region.

Evidence continually suggests LG&E-KU’s parent company PPL wants the benefits of both a monopoly and the free market with neither model’s limitations, e.g., their recent legal brief writing off public comments on their IRP as, “not constructive” and urging PSC’s disregard. We urge the PSC to restore balance to that continuing tension, including the public benefits incumbent upon a “regulated natural monopoly.” Specifically, **we think a captive customer base and assured profits and returns on equity (ROE) should entail the following social contracts explicitly within their IRP:**

**Coherent, Progressive Planning Grounded in Reality:** We see little evidence that the utilities took their IRP responsibilities seriously; instead, their IRP looks like something from the 1950s. They seem focused, not on the reality of climate change, but on keeping their options open and extracting maximum ROE. That approach would be their privilege if they were everyday private-sector businesses, but they are regulated monopolies that are supposed to be compelled to serve their customers’ interests, too.

After WWII, American electric utilities enjoyed reliable growth in sales of about 1%/year ... until lately when sales flatlined and then began to decline. We suspect that change inspired PPL’s aggressive efforts to institute anti-consumer policies to maximize their profits. We note



that it didn't take a rocket scientist to foresee the current sales decline, yet it should be readily apparent, too, that the electrification of our economy, especially as more Kentuckians switch to electric vehicles, will restore annual increases in sales soon.

These utilities recently were allowed to eliminate nearly all efficiency programs as well as parity in solar net-metering and to increase their monthly service fees—reducing customers' returns on their investments into energy efficiency and renewable energy.

**Rather than stating they will burn coal until 2066, the IRP should show clear evidence that they're taking the climate crisis very seriously. We implore you to require them to match their plans to climate reality.**

**Energy Efficiency:** Energy efficiency (E2) is the fastest, least cost and greenest way to meet our energy needs. E2 (and renewable energy sources) cool our planet and create much needed good jobs that pay decent wages and benefits and that cannot be exported.

A few years ago, the utilities were allowed to cancel nearly all their demand-side management programs (DSM), using a model that disfavored customers. That model came from a single PSC ruling rendered in the late-1990s. It should be reevaluated for modern relevance.

That the LG&E-KU IRP proposed no new E2/DSM programs suggests a preference for sales revenues over equity, public health and public safety. **We beg the PSC to require more DSM programming using a more modern method, e.g., the one used by your peers in California.**

**Renewable Energy:** We recognize that stranded assets are a huge concern. We expect that consumers are on the hook for full ROE, plus the costs of retiring dirty power plants and replacing them with cleaner renewables and storage facilities.

However, if we wait until the last penny of ROE has been extracted, we will pay more to the utilities than retiring them earlier. We submit that the increasingly severe, even sometimes deadly impacts of climate change—heat, higher cooling costs, lower farm yields and costlier groceries, flooding, failed infrastructure and much more—are hugely more expensive. **We urge you to protect consumers by ensuring the utilities pay to retire and replace dirty infrastructure as soon as feasible rather than pay those costs plus inflation over decades.**

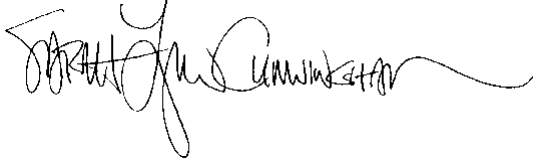
For the sake of our children and grandchildren, it is imperative that LG&E-KU transition to renewable power production aggressively and cooperate with distributed, customer-owned generation. For example, net-metering should reflect the avoided costs to the utilities when power is fed directly into the distribution system rather than transmitted over long distances.

After all, our nation broke up Ma Bell's control of all landlines and didn't allow one company to control the competing technologies, e.g., mobile and VOIP phones. Electric utilities likewise shouldn't be allowed to control customers' competing technologies.

The IRP fails to explain concretely how LG&E-KU will ensure that PPL—which owns them and no other power-generation capacity—will meet PPL’s stated greenhouse-gas emissions reduction goals, much less the terms of the Paris Accord.

**Vulnerable Customers:** We believe that, unless the utilities are required to assist lower-income customers—disproportionately people of color who have had the deck stacked against them throughout our nation’s history—with affordable tools for lowering their usage, we will see increasing numbers of our neighbors lose service for inability to pay their utility bills. **We urge you to require LG&E-KU to show how it plans to serve *all* customers.**

Cooperatively,  
Sarah Lynn Cunningham, PE

A handwritten signature in black ink, appearing to read "Sarah Lynn Cunningham", with a long, sweeping flourish extending to the right.

Executive Director

**From:** [PSC Public Comment](#)  
**To:** [REDACTED]  
**Subject:** RE: Comment about LG&E plan on reducing use of fossil fuels  
**Date:** Tuesday, July 19, 2022 9:07:00 AM

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Case No. 2021-00393

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Thank you for your interest in this matter.

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**From:** PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>  
**Sent:** Tuesday, July 19, 2022 7:45 AM  
**To:** PSC Public Comment <PSC.Comment@ky.gov>  
**Subject:** FW: Comment about LG&E plan on reducing use of fossil fuels

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**From:** [REDACTED] >  
**Sent:** Monday, July 18, 2022 9:13 PM  
**To:** PSC Consumer Inquiry <[PSC.Consumer.Inquiry@ky.gov](mailto:PSC.Consumer.Inquiry@ky.gov)>  
**Subject:** Comment about LG&E plan on reducing use of fossil fuels

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Dear Sirs,

I read with great concern about activists appearing before your Commission in a hearing last week in Frankfort. The news reported they complained about Louisville Gas & Electric not shutting down coal-powered generation fast enough. I am writing to you simply to let you know that there are many of us who do not agree with those activists. I know you are very knowledgeable people, so I realize I'm not send you any information that you don't already know, but I attach a scanned copy of two recent articles in The Wall Street Journal that document the trouble similar activists have created in California and Texas where there is not enough electricity available because wind and solar sources are relied upon for a large portion of their electricity generation and those sources haven't been reliable.

I am a consumer of electricity from LG&E and want to continue to have dependable electricity without blackouts from insufficient generation when the sun isn't shining or the wind isn't blowing. Please do not give into the complaints of those activists.

Thank you for considering my opinion.

Stephen Gwin

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