Case No. 2022-00402

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, 2022-00402, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00402 (ky.gov)</u>

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>
Sent: Monday, August 28, 2023 10:01 AM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission <<u>pscfilings@ky.gov</u>>
Sent: Monday, August 28, 2023 9:38 AM
To: PSC Consumer Inquiry <<u>PSC.Consumer.Inquiry@ky.gov</u>>
Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by (Monday, August 28, 2023 at 9:37 AM) on

Name: Anne Boyer Address: 24 Hallsdale Drive City: Louisville State: Ky Zip Code: 40220 Phone number where you can be reached: Home phone: Utility Name: LGE State the nature of your concern: I have a concern with LGE proposing a rate increase for Louisville Ky. This puts an enormous burden on low income & fixed income recipients like myself. With the current living cost this increase would be financially hard on myself. Could you please reconsider the proposed increase at this time until a further time. Going into winter, I have to be cold again because I have to keep lowering my thermostat each time they increase the rates. I have medical issues that make the cold unbearable. Thank you for your time. Anne BOYER Have you contacted the utility about the problem: No

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Thank you for your interest in this matter.

From: Sarah Lynn Cunningham Sent: Monday, August 28, 2023 4:57 PM To: PSC Public Comment <PSC.Comment@ky.gov> Subject: Re: PLS CONFIRM RECEIPT: Comments on Case 2020-00402





Thanks for acknowledging our letter. I admittedly wrote it right after returning from vacation, subsequently found a mathematical error and, while to the applicant's favor, it seems important to keep my facts straight when challenging others to do the same. If I'm not too late, please accept the attached revised edition into the formal record.

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

On Wed, Aug 23, 2023 at 10:04 AM PSC Public Comment <<u>PSC.Comment@ky.gov</u>> wrote:

Case No. 2022-00402

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will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00402, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00402 (ky.gov)</u>

Thank you for your interest in this matter.

From: Sarah Lynn Cunningham Sent: Tuesday, August 22, 2023 4:37 PM To: PSC Public Comment <<u>PSC.Comment@ky.gov</u>> Subject: PLS CONFIRM RECEIPT: Comments on Case 2020-00402



To whom it may concern:

Please add the attached comments into the formal record of the subject case on behalf of our 61 member nonprofit organizations, for-profit businesses, houses of worship and educational institutions.

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



28 August 2023

Commissioners Chandler, Hatton and Regan Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602-0615

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

RE: Case 2020-00402

Dear Commissioners,

l can, you can, Louisville CAN!

The Louisville Climate Action <u>Network</u> (LCAN) consists of 61 community and faith-based organizations, for-profit businesses and educational institutions in the commercial class—mostly LG&E-KU customers—plus nearly 1,200 individual subscribers and over 1,300 social media followers. LCAN offers programming within three realms:

- <u>Technical assistance</u>, i.e., energy efficiency audits and guidance on "going solar," to our nonprofit and faith-based clients so they may "spend less on utilities, more on mission." (<u>One recent client</u> implemented enough of our recommendations to halve their LG&E bills *and* then expand their community services, rather than close their doors.) For nearly all of our clients, we handled their applications for LG&E rebates.
- 2. Educational programming on solutions to climate change.
- 3. Advocacy for smarter public policies that cut carbon pollution and costs.

The matter before you should be considered within the following contexts:

- Our planetary home is on fire. "Extreme" has become endemic to our weather forecasts. Last month was the hottest on record. Storms are increasingly destructive. Droughts are longer and deeper, too often leading to record fires. Insured losses—a fraction of true losses—from climate charged events are setting records, too. It's long past time to stop conscripting ratepayers into underwriting fossil-fueled power plants. Business as usual is conscripting our grandchildren to a miserable existence, and is morally wrong when we have other options.
- 2. Once ratepayers are conscripted to underwrite power plants—here, a proposed \$1.3 billion—utilities insist on extracting every possible penny of profit from them. Indeed, for decades, stranded assets have been an excuse for delaying a transition to renewable power sources. (Paddy's Run, one of the coal-fired plants proposed to be demolished, is around 80 years old!) When the climate crisis forces LG&E-KU-PPL to cease using these proposed gas-fired power plants sooner than even 50 years, will ratepayers be

Louisville Climate Action Network P.O. Box 4594, Louisville, KY 40204 502-451-COOL (2665) LouisvilleCAN.org tagged with, not just their capital, operating and maintenance costs plus profit, but also eventually reimbursing their stranded assets, too?

- 3. Energy efficiency is the cheapest, cleanest and fastest "source" of power, yet LG&E-KU-PPL have made inordinately limited use of it. Citing stranded assets and a 20year-old ruling using an archaic model, LG&E-KU-PPL killed nearly all of their residential-sector demand-side management (DSM) programs a few years ago. We suspect the new DSM programs were proposed only because PPL wants more generating capacity, yet foresaw that ratepayers rightly would object to paying only for supply-side management.
- 4. LG&E-KU-PPL actively suppress customer-owned solar power—a key tool in our climate-action toolbox. The U.S. didn't allow Ma Bell to control all landlines, much less all mobile phones. Yet investor owned utilities (IOUs) spent a documented seven digits on legal bribes (aka "reelection-fund contributions") and public disinformation campaigns to get changes to state laws to rig the game and extend their monopoly onto the sun. Even when the PSC ruled on net-metering with some fairness, LG&E-KU interpreted the ruling to its advantage and is charging new net-metered customers disadvantageously. The matter remains in court, depressing customer investment.
- 5. LG&E-KU are owned by PPL, which owns several other electric utilities. Unless something has changed recently, its other utilities do not generate power. Instead, they only buy and distribute wholesale power. Whose customers need more power? LG&E-KU or other PPL utilities? Kentucky has a long history of exporting wholesale power, such that we get the externalized disbenefits of power production and other states get cheaper rates. Enough already.

We urge the PSC to make the following rulings:

- 1. Approve the proposed solar installations.
- 2. Approve the DSM programs.
- 3. Deny the construction of new fossil fueled power plants—at least until the following reasonable conditions have been met:
 - a. Affordable DSM programming to the residential and commercial sectors are expanded and funded commensurately with energy efficiency's potential to lower customers' carbon footprints.
 - b. Special DSM programs appropriate and practical for low-income customers, both homeowners and renters, are instituted and funded commensurate with

the need to lower bills and cut carbon pollution. (We would rather subsidize our neighbors than the status quo of poverty and pollution.)

- c. Commercial customers' participation in the Building Operator Certification program is subsidized to ensure participation throughout the service areas.
- d. The utilization of solar power, including net-metering with parity and a fairly priced Solar Share program for customers who can't install panels on their property, has been maximized commensurately with its potential. (Kentucky receives 50% more sunshine than Germany, a world leader in solar power.)
- e. Retrofit hydropower production on existing river dams.
- f. The viability to use enhanced geothermal power—by drilling 10 km below grade to tap temperatures of 300 degrees Fahrenheit or more—has been independently and open-mindedly evaluated for the potential to generate power, around the clock and especially when the sun is not shining. (Yes, 10 km is very deep, but ... if we can drill 10 km for fossil fuels, we can drill 10 km to save ourselves from the climate chaos of combusting fossil fuels.)
- g. An honest, complete Integrated Resource Plan that doesn't omit whole power plants has been submitted, reviewed and accepted as being appropriate to our climate constrained era.

Thank you very much for the opportunity to have input to these very important issues that affect our climate, members and clients.

Cooperatively,

MRH AN UNINEAHAD

Sarah Lynn Cunningham, PE Executive Director

¹ Full disclosure: I teach six of the many courses offered by the Building Operators Certification program on behalf of the Midwest Energy Efficiency Alliance.