

From: [PSC Public Comment](#)
To:
Subject: RE: Comments Case 2022-00402
Date: Monday, October 9, 2023 10:54:00 AM

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 [View Case Filings for: 2022-00402 \(ky.gov\)](#)

Thank you for your interest in this matter.

From: Lane Boldman [REDACTED]
Sent: Tuesday, October 3, 2023 3:10 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Comments Case 2022-00402



Please find attached comments on Case #2022-00402.
I thank you for your time.

--
Lane E. Boldman
Director, Kentucky Conservation Committee
[REDACTED]
[REDACTED]
Office: [REDACTED]
Cell: [REDACTED]



Kentucky Conservation Committee

Established 1975

From: Kentucky Conservation Committee, Lane Boldman
PO Box 1152, Frankfort, KY 40602

To: Public Service Commissioners
RE: Case 2022-00402

We wish to submit comment on case 2022-00402, on the request by LG&E/KU to retire four coal-fired electric generating units and three natural gas simple cycle combustion turbine units and replace them with two natural gas combined cycle facilities, two solar facilities, one battery storage facility, and four solar power purchase agreements.

We have reviewed many of the comments submitted to date and attended portions of the public hearings and meetings. From this, we wish to comment on certain specific points raised.

First, we support the retirement of four coal-fired electric generating units and three natural gas simple cycle combustion turbine units. We support the addition of two solar facilities, one battery storage facility, and four solar power purchase agreements. We object to the proposal to add two natural gas combined cycle facilities on the basis of how these will impact carbon-reduction goals and prefer that the utility bridge this capacity with a more robust energy efficiency and demand-side management program, and the addition of more storage for renewable energy.

Many comments received from the public raised the concerns about energy efficiency and demand-side management. KCC was a participating nonprofit in their Advisory group for LG&E/KU's Demand Side Management Stakeholders, and we wish to state that we found the conclusions of the utility representatives in the stakeholder group to be inadequate. We found the process to be lacking in transparency, with inadequate data provided to fully evaluate whether the companies have developed a portfolio of programs that best meets customer needs and balances customer interests. The most significant impact was the failure to disclose their plans to develop these two new natural gas plants.

We believe that Demand-Side management and energy efficiency should not be conducted in isolation from generation and supply planning. In the interest of minimizing costs and risk to ratepayers, meeting PPL's net zero carbon goals, and achieving carbon emission reduction goals that have been set by Louisville Metro Government. DSM planning should have been conducted explicitly in the interest of avoiding new construction of fossil fuel generation. We believe that there was far more opportunity to leverage DSM and Energy Efficiency than LG&E/KU have provided.

Secondly, we have noted the many comments sent to you that were questioning the reliability of renewables, and statements that coal-fired sources were more reliable, specifically citing examples such as last November's Winter Storm Elliott. We believe the evidence does not support these conclusions. We believe a well-designed and diverse portfolio, including non-carbon sources such as renewables and storage, can provide adequate reliability and will be increasingly essential in a carbon-constrained world that is rapidly transitioning to low and net zero carbon resources. LG&E/KU's continued heavy dependence on carbon-based sources places the utility, and its customers, at higher risk as industries and consumers are demanding cleaner energy options.



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LG&E/KU's own after-action report on the storm showed that outages due to reliability issues—both related and unrelated to Winter Storm Elliott—caused the loss of at least 822 MW of coal generation. This was more than twice the generation needed to have prevented rolling blackouts during the weather event: LG&E/KU shed 317 MW of load at the utility's time of peak need.

390 MW of coal power were offline at the time of peak need due to winter weather failures. If this generation had been available, or if any of the 432 MW unavailable on December 23 due to unrelated mechanical failures had been available, LG&E/KU would not have had rolling blackouts during Winter Storm Elliott. LG&E/KU's coal-fired generation failures were therefore one cause of the rolling blackouts during Winter Storm Elliott.

Utility executives' own testimony identified multiple mechanical and process failures of coal-fired power at Trimble units 1 and 2, Mill Creek 4, and OVEC that compounded energy delivery at this critical time.

Replacing this capacity with gas turbines under the argument of "reliability" is not sufficient considering the extreme cold also impacted gas plants and the reliable delivery of natural gas, which is particularly vulnerable to sudden temperature drops and resulted in a depressurization of systems at critical junctures during the freeze.

LG&E/KU's Power supply Director Charles Schram stated that "Our system on any given day is almost never perfect. . . . this is pretty complex equipment, it is subject to cold weather stresses, and you do see these types of derates in colder weather."

We reviewed the testimony by Andrew Levitt, provided in the case files, that offered an analysis on the benefits of LG&E-KU joining a Regional Transmission Organization (RTO) such as the PJM. It seems like such a proposal could also address reliability concerns. Mr. Levitt concluded that that LG&E-KU could meet its resource needs and meet standard reliability targets through 2029 without building the two proposed new Natural Gas Combined Cycle facilities, "and thereafter with only modest capacity market purchases for several years."

In summary, we ask the PSC to:

- Require utilities to provide a new review of DSM/EE programs, as the proposed programs do not meet Kentucky's needs for energy conservation or the needs of low and moderate income rate payers, and do not fully leverage the important role of DSM/EE in meeting capacity needs and supporting grid reliability.
- Approve the solar and storage proposals, and encourage more support for storage as well as distributed solar
- Approve the planned coal retirements
- Disapprove the proposal for two new gas plants
- Require the companies to study the cost and benefits related to joining a Regional Transmission Organization

We appreciate your attention to this matter and the work of your agency.
Sincerely,



Kentucky Conservation Committee

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Ms. Lane E. Boldman
Director, Kentucky Conservation Committee

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To:
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From: PATRICK DELAHANTY [REDACTED]
Sent: Tuesday, October 3, 2023 12:05 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: 2022-00402

To Whom It May Concern:

I am writing to comment on case 2022-00402 regarding the proposal made by LG&E and KU that is currently before the Public Service Commission.

As an LG&E customer I am happy to see the company moving away from the use of fossil fuels by the closing of several coal-fired plants. Nevertheless, I do not think these two companies have gone far enough. They still intend to invest too much in the use of natural gas compared to what they say they will invest in solar projects.

I would encourage the commission to approve the closing of any fossil-fuel sourced plants and limit the utility companies in their pursuit of the use of natural gas and require their greater investment in solar, wind, and other methods of generating electricity that reduces the amounts of carbon dioxide that cause the warming of our atmosphere.

Thank you for taking my concerns into consideration.

Rev. Patrick Delahanty
613 Zane Street
Louisville, KY 40203

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: case #2022-00402
Date: Monday, October 9, 2023 10:55:00 AM

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Thank you for your interest in this matter.

From: [REDACTED]
Sent: Wednesday, October 4, 2023 2:56 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: case #2022-00402

Re: case #2022-00402

I understand that Louisville Gas & Electric and Kentucky Utilities have put forth proposals to close four coal-fired plants and three natural gas combustion turbine units and the addition of two solar facilities and a battery storage facility. I am in favor of these proposals. But I am not in favor of more natural gas facilities.

In addition, I would like to see them increase Demand-Side Management programs.

I hope for a clean, efficient and renewable energy future for Kentucky.

Donna Bohn
8099 Regency Woods Way
Louisville, KY 40220

From: [PSC Public Comment](#)
To:
Subject: RE: LGE and KU Utility plans.
Date: Monday, October 9, 2023 10:55:00 AM

Case No. 2022-00402

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Thank you for your interest in this matter.

From: Bruce Bohn [REDACTED]
Sent: Wednesday, October 4, 2023 3:07 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: LGE and KU Utility plans.

[REDACTED]

I understand that Louisville Gas & Electric and Kentucky Utilities have put forth proposals to close four coal-fired plants and three natural gas combustion turbine units and add two solar facilities and a battery storage facility. I am in favor of these proposals. I want to stress that I am not in support of adding new natural gas plants. We have to continue to move toward clean energy.

In addition, I would like to see them increase Demand-Side Management programs. These should drive demand to surface during more easily managed times.

I hope for a clean, efficient and renewable energy future for Kentucky.

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: Public comment on PSC case #2022-00402
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Thank you for your interest in this matter.

From: [REDACTED]
Sent: Wednesday, October 4, 2023 4:36 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Public comment on PSC case #2022-00402

Dear Kentucky Public Service Commission,

We cannot lock ourselves into paying for 40 more years of natural gas when we should be well into our transition away from fossil fuels. Please approve the coal retirements and reject the proposals for two new large scale 40-year fossil fuel plants.

LG&E/KU customers like me have struggled with paying our energy bills or are affected by the air pollution from fossil fuel power plants. Investing in energy efficiency (DSM) instead will help lower the overall demand for energy while helping keep energy affordable for us Kentuckians.

In addition to my public comment above, please see the comment submitted by Kentuckians for Energy Democracy for important data and evidence that supports my lived experience and concerns.

Thank you for ensuring that Kentuckians' voices are an important part of the regulatory process.

Sincerely,
Mr. Dave Newton
15 Wallace Ave Covington, KY 41014-1246
[REDACTED]

From: [PSC Public Comment](#)
To:
Subject: RE: Say "No" to LG&E and KU's Coal Retirement Plan
Date: Monday, October 9, 2023 10:55:00 AM

Case No. 2022-00402

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Thank you for your interest in this matter.

From: Timothy King [REDACTED]
Sent: Wednesday, October 4, 2023 8:20 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Say "No" to LG&E and KU's Coal Retirement Plan

October 05, 2023 @ 12:02am
Say "No" to LG&E and KU's Coal Retirement Plan

Dear Public Service Commissioners,

Please stop the plan by Louisville Gas & Electric and Kentucky Utilities to retire four coal-fired power plants. "Coal keeps the lights on" isn't just a slogan for a license plate or a "cutesy" phrase used to promote one of Kentucky's oldest industries. It's the truth. Coal has kept the lights on for more than two centuries and will continue to do so as long as we protect Kentucky's coal industry.

My family relies on affordable and reliable power but replacing coal-fired plants with solar and battery storage facilities is not going to make "keeping the lights on" easy. With high inflation rates, shocking prices at the pump, expensive grocery trips and high energy bills across the country, this plan will only make matters worse for those struggling to make ends meet here at home.

I urge you to oppose the efforts of Louisville Gas & Electric and Kentucky Utilities to retire four coal-fired electric generating units over the next few years. Hard-working Kentuckians oppose this move, and so should you.

Sincerely,
Timothy King

199 Oak Cliff Dr Oneida , TN ,
Oneida, TN 37841

