

From: [PSC Public Comment](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Synthica Public Comments Case No 2024-00125
Date: Thursday, September 26, 2024 12:47:00 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)


Case No. 2024-00125

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, 2024-00125, in any further correspondence. The documents in this case are available at [View Case Filings for: 2024-00125 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Jesse Blair [REDACTED]
Sent: Thursday, September 26, 2024 9:28 AM
To: PSC Public Comment <PSC.Comment@ky.gov>
Cc: Grant Gibson [REDACTED]
Subject: Synthica Public Comments Case No 2024-00125



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Good morning,

Please see attached comments from Synthica Energy for Case No 2024-00125. Thank you for the opportunity to provide comments and let us know if any follow up questions.

Thanks,
Jesse

Jesse Blair



Director RNG Development, Synthica Energy

Mobile: [832.689.7341](tel:832.689.7341) synthica.com

[Houston, TX](#)

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September 26, 2024

Ms. Linda C. Bridwell, Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0515

RE: Case No. 2024-00125; ELECTRONIC TARIFF FILING OF
LOUISVILLE GAS AND ELECTRIC COMPANY TO REVISE ITS LOCAL
GAS DELIVERY SERVICE TARIFF

Dear Ms. Bridwell,

Synthica Energy, LLC (“Synthica”) hereby submits the following public comments to the Kentucky Public Service Commission (“PSC”), which highlight its concerns regarding Louisville Gas and Electric’s (“LG&E”) proposed tariff changes filed in Docket TFS2024-00136.

Synthica designs, builds, owns, and operates large-scale anaerobic digestion biogas facilities (“AD facilities”) that convert pre-consumer food and industrial organic waste into renewable natural gas (“RNG”). Synthica was founded in 2017 in Cincinnati, Ohio, by Sam Schutte and Grant Gibson, and broke ground on its first AD facility, located in St. Bernard, Ohio, in the summer of 2023. The St. Bernard facility is expected to be in service in Q2 2025. Synthica is developing a network of AD facilities across the United States, including potentially in Kentucky.

Synthica seeks to partner with the local communities in which it develops and operates AD facilities in an effort to eliminate landfill waste and promote a circular economy. Along with Synthica’s significant capital investments in such communities, these projects are predicted to generate 30+ local construction jobs and 20 permanent high paying jobs once operations begin, while also increasing local tax revenue and decreasing local greenhouse gas emissions.

In 2021, Synthica approached LG&E to request access to its system through a pipeline interconnect in Lebanon Junction, Kentucky. This interconnect would enable the flow of RNG produced by Synthica's local facility in development into LG&E's system. On May 29, 2024, Synthica received notice that LG&E would be willing to accept RNG into its system.

On March 29, 2024, however, LG&E Docket TFS2024-00136 with the proposed tariff changes was filed. LG&E's proposed changes to gas quality and minimum heating value would effectively prevent Synthica from injecting its RNG into LG&E's system. Synthica has had discussions with many other utilities and interstate and intrastate pipelines across the country; the proposed new requirements by LG&E far exceed any other minimum heating value from all other potential interconnect sites under consideration.

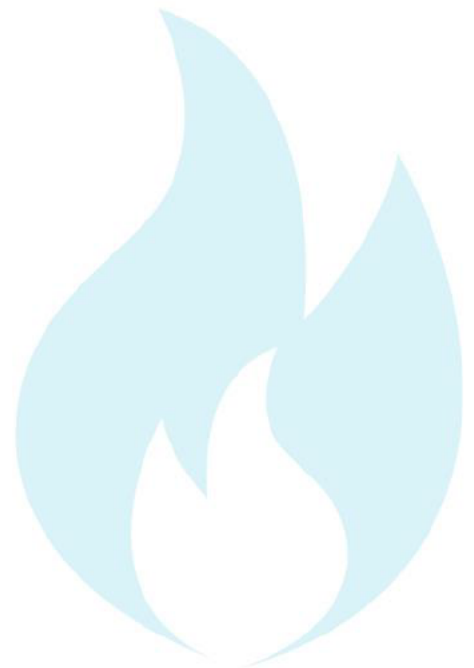
Given the potential benefits of RNG development in Kentucky and within LG&E's service territory, Synthica strongly urges the Commission to consider the negative impact of approving LG&E's proposed tariff changes.

Very truly yours,
SYNTHICA ENERGY, LLC

By: _____

Name: Grant Gibson

Title: Chief Development Officer



*Honorable Allyson K Sturgeon
Vice President and Deputy General Counsel-
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Sara Judd
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*William H May, III
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*Michael Hornung
Manager, Pricing/Tariffs
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

*Honorable Matthew R Malone
Attorney at Law
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*Monica Braun
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010