From: PSC Public Comment
To: John D. Wilson

Subject: RE: Public Comment for Case 2025-00113 - Kentucky Utilities Company

Date: Wednesday, September 3, 2025 10:47:00 AM

#### Case No. 2025-00113

Thank you for your comments on the application of Kentucky Utilities 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, 2025-00113 in any further correspondence. The documents in this case are available at View Case Filings for: 2025-00113 (ky.gov).

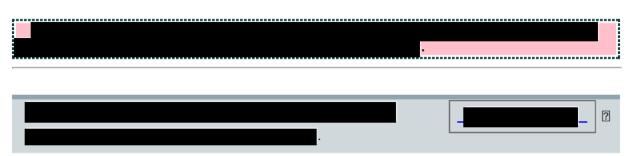
Thank you for your interest in this matter.

From: John D. Wilson

Sent: Friday, August 29, 2025 1:15 PM

To: PSC Public Comment < PSC.Comment@ky.gov>

Subject: Public Comment for Case 2025-00113 - Kentucky Utilities Company



I am writing to request that the Commission take note of my complaint filed in Case No. 2025-00189 (attached) in this proceeding. Briefly, my complaint alleges that Kentucky Utilities has failed to demonstrate sufficient effort in providing reliable service to my neighborhood, and that there may be other similarly situated neighborhoods.

I understand that Kentucky Utilities is asking to increase its return on equity to 10.95% and states that it has achieved "operational excellence" in its distribution network. I, and many of my neighbors, do not agree that we have experienced operational excellence from Kentucky Utilities.

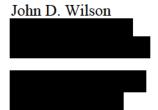
While the Commission has not yet ordered the production of evidence from Kentucky Utilities in response to our complaint, I hope that the Commission will take into consideration the unreasonable deferral of what appears to be necessary maintenance of its distribution system and the impacts on many customers' reliability.

While Kentucky Utilities may have satisfactory reliability metrics for its distribution system on average, the information sought in my complaint should indicate whether many distribution circuits have a record of substantially unsatisfactory reliability.

The Commission should investigate how many customers have invested in backup gas generation as a consequence of this deferred maintenance. In such an investigation, the Commission should consider (a) that many customers are unable to afford personal generators attached to the gas system (either using portable generators or suffering through unnecessarily extended outages) and (b) that the increasing number of gas generators is causing the "need" for additional investment in expanding the natural gas distribution system to accommodate locally peak demand during electric power outages.

If the Commission finds that Kentucky Utilities does have distribution circuits with substantially unsatisfactory reliability, and that its performance may have contributed to the "need" for investment in gas infrastructure, then the Commission should consider (a) factoring this performance into its determination of ROE, (b) potential disallowance of costs for electric system overtime response for repairs, and (c) potential disallowance of gas distribution system upgrade costs.

Thank you,



April 5, 2025

Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602-0615

#### **Dear Commissioners:**

The undersigned customers of Kentucky Utilities have experienced several extended power outages in the past year with slow restoration of service. Multi-day outages were experienced during Tropical Storm Helene (2024) and Winter Storm Blair (2025). This neighborhood experienced much longer restoration periods than many other neighborhoods in both events.

According to one neighbor's record, one circuit in this neighborhood has experienced at least 20 non-momentary power outages in the past five years, which substantially exceeds outage levels reported by KU for its system-level reliability, presumably, KU's reliability targets. This level of unreliability extends back at least a decade, suggesting that KU has systemically neglected to properly maintain the distribution system serving some of its customers.

One feeder segment, serving 43 customers on the block between Jesselin and Blueberry from Bellefonte to Heather, and also some customers on the block bounded by Glendover, Heather, and Jesselin, has been particularly problematic. Most of the signers of this letter are served by this feeder segment.

In a recent incident on February 16, 2025, according to contemporaneous data from LGE/KU's outage information, that feeder segment lost power for about five hours beginning at 4:50 am. Initially, the outage information reported that power would be restored by 8:30 am. After that time, the outage information was reportedly being "reassessed." However, one customer surveyed the affected area twice during the outage period and spoke to other pedestrians – no LGE/KU crews were sighted by anyone. That customer attempted to reach a customer service agent to verify that the outage had not been forgotten, but remained on hold for well over an hour because, according to the hold message, "representatives were busy helping other customers." This incident raises questions about what work was required to restore service for this small outage, why it took so long, and the accuracy (or usefulness) of KU's real-time outage information.

Later on the same day, there was a second outage lasting about an hour. Then on February 19, 2025, there was a third outage for several hours affecting the same 43 customers. At the end of this outage, a single bucket truck was spotted leaving the area where the network feeder appears to be supplied by a neighborhood distribution circuit, with the truck appearing to have just one or two crew members. To the non-expert viewing the level of response to the February outages, it would appear that crews were dispatched to restore circuit breakers that had tripped and nothing more than that.

To address our concerns, affected residents request that the Kentucky Public Service Commission direct Kentucky Utilities to provide information in electronic format (worksheets, pdf files, etc.), as follows:

- 1. SAIDI, SAIFI and CAIDI data in the format supplied to the US Energy Information Administration at the following levels of detail, for the past ten years:
  - a. System
  - b. Circuits (each circuit on system)
  - c. Feeder segments (each feeder segment in Fayette County)
- 2. A list of the Worst Performing Circuits on the KU system for each of the past ten years.
- 3. Identify the circuits and residential feeder segments in the vicinity of Glendover Elementary School (within roughly one mile) by map or other geographic information sufficient to provide residents with appropriate reference.
- 4. A summary of all outages affecting the circuits and feeder segments referenced in question 2, including cause, duration, number of customers affected, and actions taken to effect restoration of service for Tropical Storm Helene, Winter Storm Blair, February 16, and February 19, 2025.
- A description of each unplanned maintenance project completed on the circuits and feeder segments referenced in question 2 during the past 10 years, including in-service date and impacted circuits.
- 6. Information regarding staffing and call volume for LGE/KU's customer service center for February 16, 2025.
- 7. An explanation of the vegetation management program and whatever readily available data are available regarding its implementation in Fayette County during the past five years, including work volume and affected circuits.
- 8. A list of all distribution reliability enhancement projects completed in Fayette County during the past ten years, including in-service date and impacted circuits.
- 9. A list of all distribution reliability enhancement projects planned for Fayette County, including expected in-service date and affected circuits and feeder segments.
- 10. Any additional information that is relevant to the subject of this complaint.

Affected residents request that this be treated as a formal complaint, or to be informed as to any further steps necessary to file a formal complaint on this matter.

Affected residents also request that the Commission provide an opportunity for further inquiries or elaboration of this complaint after having an opportunity to review Kentucky Utilities' responses to the above questions.

Sincerely,

John D. Wilson, Affected Residents Point of Contact



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## Affected Residents (all Lexington, KY 40503):

## Kristi Bartlett



We have purchased a portable generator to ensure that our sump pump continues working during power outages. Unfortunately, our refrigerator does not work on the generator which I understand to be a common problem with some models, so we continue to lose food during extended power outages.

## John Michael and Amy Cowley



In September of 2024, we brought home our 3-day old newborn and soon after, lost power for 4 days. Caring for a newborn while recovering from C-section surgery without access to recovery aids such as a heating pad and ice was very difficult. We decided we could no longer rely on KU to restore power in a timely manner, and have installed a wholehome generator (\$17,000.)

## Maria Fitzpatrick



Two years ago I had a whole house backup generator installed. I would have preferred not to have to do this as it cost over \$15,000, but it was worth it to me to have the peace of mind it provides. I understand that not everyone is in a position to do this, and that only underscores how unfair this situation is.

# Therese Moseley



Having lived here 42 years, we can tell a long story about power outages. We have 3 or 4 minor ones every year and have had no power for more than a week after major storms.

#### Tom McNally



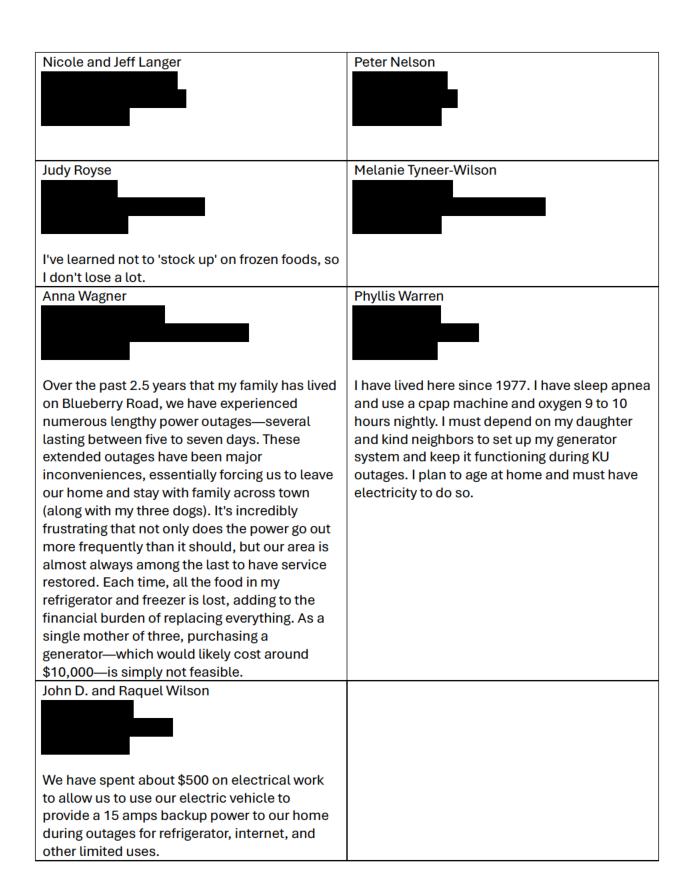
Overnight outages are the most frustrating, not only in loss of HVAC and household appliances but disruption of my CPAP + supplemental oxygen treatment for sleep apnea. Failures during sleep periods are quite startling!

Over the years, I have 1) "stuck it out" for over a week due to an ice storm in 2003, 2) utilized access to unaffected relatives' hospitality, 3) found motel lodging, etc., 4) borrowed portable generator from friends and 5) purchased my own portable generator and power cords at costs exceeding \$1000.

# Heidimarie Morgan



Since we moved here in 2017, the power outage frequency has significantly impacted our ability to be safe and prosper. In the last 2 years alone, our power has been "off" five (5) significant amounts of time (over 24 hours up to 3 days) to the point of needing to pay to stay elsewhere, and/or have created tangible adverse effects on my neuro-diverse son's mental health. For outages during freezing temperatures, our costs are about \$250 plus the cost of eating out and replacing food that we obtained from donations or the food bank.



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