

**From:** [PSC Public Comment](#)  
**To:** ["Wiley, Jeremy"; PSC Public Comment](#)  
**Subject:** RE: Electrify America Public Comments for Case No. 2025-00113 and 2025-00114  
**Date:** Wednesday, October 8, 2025 8:49:00 AM  
**Attachments:** [image001.png](#)

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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.

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[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Wiley, Jeremy [REDACTED]  
**Sent:** Monday, October 6, 2025 12:31 PM  
**To:** PSC Public Comment <PSC.Comment@ky.gov>  
**Subject:** Electrify America Public Comments for Case No. 2025-00113 and 2025-00114

[REDACTED]

[REDACTED]

Hi,

Electrify America formally submits the attached comments regarding the proposed EV tariffs for utility owned infrastructure.

Thanks,

**Jeremy Wiley**

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Public



October 3, 2025

Linda Bridwell, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**Re: Case No. 2025-00113; Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates and Approval of Certain Regulatory and Accounting Treatments; and**

**Case No. 2025-00114; Electronic Application of Louisville Gas & Electric Company for an Adjustment of its Electric and Gas Rates and Approval of Certain Regulatory and Accounting Treatments**

Dear Ms. Bridwell,

Electrify America, LLC ("Electrify America") respectfully submits the following comments in response to the May 30, 2025 submissions of the Kentucky Utilities Company's ("KU") Application, Statutory Notice, and Filing Requirements, as well as the Louisville Gas and Electric Company's ("LG&E") Application, Statutory Notice, and Filing Requirements (collectively, the "Petitions") submitted in the above-referenced proceedings.

On May 30, 2025, KU and LG&E submitted their Petitions, within which KU and LG&E included in their proposed tariffs standard rate EVC, available to customers utilizing company-owned electric vehicle supply equipment<sup>1</sup>. As part of this proposed rate, KU and LG&E include a proposed rate of \$0.25 per kilowatt hour ("kWh") for electric vehicle ("EV") drivers charging at their utility-owned stations. Companies such as Electrify America that operate private charging infrastructure typically take service under KU and LG&E's Time-of-Day Secondary Service, for which we pay significantly more than \$0.25 per kWh based on typical load factors for EV fast charging stations. It is untenable that the utility is providing charging services at lower cost per kWh than it charges its own commercial customers to take service from it directly.

The rates charged at the utility-owned stations are significantly lower than those that can be reasonably charged by Electrify America and other private charge point operators ("CPO") in order to recover costs to pay the utility bill issued by KU and LG&E alone – notwithstanding the capital investment or other operational expenses incurred to serve EV customers. This

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<sup>1</sup> Case No. 2025-00113, Attachment to Filing Requirement, Tab 4 - 807 KAR 5:001 Section 16(1)(b)(3) at 90; Case No. 2025-00114, Attachment to Filing Requirement, Tab 4 - 807 KAR 5:001 Section 16(1)(b)(4) at 88.



creates a significant competitive disadvantage for private CPOs and makes it nearly impossible to attract customers to privately-owned fast charging stations within the service territories of KU and LG&E. Additionally, private CPOs like Electrify America do not have the benefit of being able to recover the costs of owning and operating fast-charging infrastructure from utility ratepayers. CPOs must recover such costs through the rates charged to end users at their charging stations.

Accordingly, Electrify America suggests that as the Commission determines whether or not to approve the EV rates proposed within the Petitions, it consider the impact of such rates on private entities that seek to fill the gaps in utility owned and operated EV fast charging infrastructure, and provide a competitive environment where such companies have an opportunity to operate on a level playing field with KU and LG&E.

Sincerely,

**Rhiannon Davis**

Director of Government Affairs

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