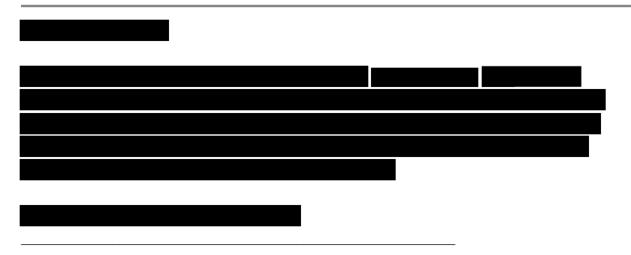
From: PSC Public Comment

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.pnq



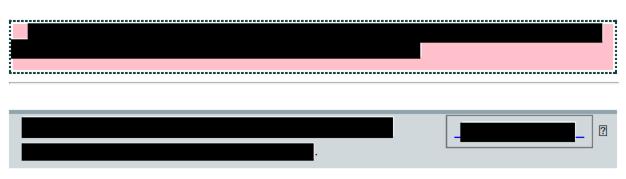
Case No. 2025-00114

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, 2025-00114 in any further correspondence. The documents in this case are available at View Case Filings for: 2025-00114 (ky.gov).

Thank you for your interest in this matter.

From: Wiley, Jeremy
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



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

Thanks,

Jeremy Wiley

Electric Utility Rates and Programs Lead

1950 Opportunity Way Suite 1500 Reston, VA 20190 m: +1 (323) 207-3962 extern.Jeremy.Wiley@electrifyamerica.com



Public



October 3, 2025

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

> Case No. 2025-00113; Electronic Application of Kentucky Utilities Company Re: 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 equipment¹. 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

¹ 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 Electrify America, LLC Rhiannon.Davis@electrifyamerica.com *Angela M Goad Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KY 40601-8204 *Tom Fitzgerald Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KY 40602 *John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Ashley Wilmes Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KY 40602 *Hannah Wigger Sheppard Mullin Richter & Hampton LLP 2099 Pennsylvania Avenue NW, Suite 1 Washington, DC 20006 *Honorable Kurt J Boehm Attorney at Law Boehm, Kurtz & Lowry 425 Walnut Street Suite 2400 Cincinnati, OH 45202

*Honorable Allyson K Sturgeon Vice President and Deputy General Counsel-LG&E and KU Energy LLC 220 West Main Street Louisville, KY 40202 *James B Dupree 50 Third Ave Building 1310- Pike Hall Fort Knox, KY 40121 *Kyle J Smith General Attorney U.S. Army Legal Services Agency 9275 Gunston Road ATTN: JALS-RL/IP Fort Belvoir, VA 22060-554

*Byron Gary Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KY 40602 *Jeff Derouen
Assistant County Attorney
Louisville/Jefferson County Metro Government
First Trust Centre
200 South 5th Street, Suite 300N
Louisville, KY 40202

*Honorable Lindsey W Ingram, III Attorney at Law STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KY 40507-1801

*Carrie H Grundmann Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 *James W Gardner Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KY 40507 *Lawrence W Cook Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KY 40601-8204

*Honorable David Edward Spenard Strobo Barkley PLLC 239 South 5th Street Ste 917 Louisville, KY 40202 *Jody Kyler Cohn Boehm, Kurtz & Lowry 425 Walnut Street Suite 2400 Cincinnati, OH 45202 *Matt Partymiller
President
Kentucky Solar Industries Association
1038 Brentwood Court
Suite B
Lexington, KY 40511

*Honorable W. Duncan Crosby III Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KY 40202-2828 *Joe F. Childers Childers & Baxter PLLC 300 Lexington Building, 201 West Sho Lexington, KY 40507 *J. Michael West Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KY 40601-8204 *Honorable Michael L Kurtz Attorney at Law Boehm, Kurtz & Lowry 425 Walnut Street Suite 2400 Cincinnati, OH 45202 *Randal A. Strobo Strobo Barkley PLLC 239 South 5th Street Ste 917 Louisville, KY 40202

*Nathaniel Shoaff Sierra Club 2101 Webster St. , Suite 1300 Oakland, CA 94612 *Steven Wing-Kern Lee Spilman Thomas & Battle, PLLC 1100 Brent Creek Blvd., Suite 101 Mechanicsburg, PA 17050

*Paul Werner Sheppard Mullin Richter & Hampton LLP 2099 Pennsylvania Avenue NW, Suite 1 Washington, DC 20006

*Louisville Gas and Electric Company 820 West Broadway Louisville, KY 40203

*Quang Nguyen Assistant County Attorney Louisville/Jefferson County Metro Government First Trust Centre 200 South 5th Street, Suite 300N Louisville, KY 40202 *Sara Judd Senior Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, KY 40202

*Rick E Lovekamp Manager - Regulatory Affairs LG&E and KU Energy LLC 220 West Main Street Louisville, KY 40202 *Toland Lacy Office of the Attorney General 700 Capital Avenue Frankfort, KY 40601

*Robert Conroy Vice President, State Regulation and Rates LG&E and KU Energy LLC 220 West Main Street Louisville, KY 40202 *M. Todd Osterloh Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KY 40507

*Rebecca C. Price Sturgill, Turner, Barker & Moloney 155 East Main Street Lexington, KY 40507