

Public Comments Received for Case Number: 2025-00114  
Response Friday, November 14, 2025

Thank you for your comments. 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 \(ky.gov\)](#).

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Received through Public Comments Thursday, November 13, 2025

From: Matt Malone counsel on behalf of the Kentucky Coal  
City: LEXINGTON  
State: KY  
Zip: 40507

Comments:  
Ms. Linda C. Bridwell, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

RE: Public Comments from the Kentucky Coal Association

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

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

Dear Ms. Bridwell:

Please find below public comments on behalf of the Kentucky Coal Association, Inc. (KCA) in the above-mentioned matters. Please place the document of file.

KCA fully supports the stipulation filed in Kentucky Utilities Company/Louisville Gas Electric Company's (the Companies') rate cases above. KIUC/AG witness Lane Kollen echoed these sentiments in his direct testimony in the rate case including but not limited to the Mill Creek 2 (MC2) cost recovery mechanism on September 30, 2025 – over a month before the hearing in the rate case.

Specifically, "[t]he Companies and other signatory parties attached to and referenced in the Stipulation and Recommendation a proposed new Adjustment Clause MC2 Mill Creek 2 Incremental Stay-Open Cost Recovery rider to allow LGE to recover the incremental capital costs and operating expenses incurred after Commission final approval in Case 2025-00045 necessary to continue operating Mill Creek 2 at least through 2031. The proposed Adjustment

Clause MC2 provides the formula for incremental cost recovery, including the same Group 1/Group 2 revenue allocation methodology previously adopted by the Commission for the Companies' ECR and Retired Asset Recovery riders (RARs)." Kollen, direct clean testimony p. 95.

The final order in the CPCN case (2025-00045) dated October 28, 2025 encouraged more evidence in support of the Mill Creek 2 mechanism in a separate proceeding – not granting the MC2 recovery mechanism in the CPCN matter. The Companies then provided supplemental testimony on the MC2 cost recovery mechanism, among other concerns, on October 31, 2025 in the rate case bolstering the stipulation but also allowing for cross-examination.

After reviewing the multitude of opinions, parties and evidence involved in the IRP case, CPCN case and rate cases (above), the Commission believes that the Companies have met their burden of proof to demonstrate that there is an economic development market for data center loads in its service territory. Moreover, as noted on p. 159 of the final CPCN order, the Commission believes that extending MC2 for a short time period has the potential for real upside for ratepayers.

The Companies acted prudently as quickly as reasonably possible to address this MC2 cost recovery mechanism in light of the final order in the CPCN matter on October 28, 2025. Moreover, the Companies acted consistent with the Commission's directive to provide more evidence for the MC2 cost recovery mechanism in a separate proceeding. Parties to the CPCN stipulation largely mirror the rate case stipulation with both diverse groups suggesting that the MC2 cost recovery mechanism seems reasonable and should be approved.

Based upon the above information, KCA believes that the time is ripe for the Commission to grant the Companies' request for the MC2 cost recovery mechanism. The cost recovery mechanism would remain subject to prudence reviews however the Commission determined that MC2 provides upside for ratepayers. Ultimately, the Commission is called upon to determine whether a rate is fair, just and reasonable. The need for low-cost reliable power remains important for economic development and ratepayers consistent with the market for data center loads in the Companies' service territory.

KCA respectfully suggests that the Commission grant the MC2 cost recovery mechanism for the reasons above.

Regards,

/s/Matt Malone

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