

From: [PSC Public Comment](#)
To: ["Addison Taylor"](#)
Subject: RE: KPSC Case No. 2026-00185 SREA Comments on Affordability Investigation
Date: Monday, September 28, 2026 8:48:00 AM
Attachments: [image001.png](#)

Case No. 2026-00185

Thank you for your comments on the application of Electric and Natural Gas Utility Affordability. 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, 2026-00185 in any further correspondence. The documents in this case are available at [View Case Filings for: 2026-00185 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Addison Taylor [REDACTED]
Sent: Friday, September 25, 2026 1:40 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: KPSC Case No. 2026-00185 SREA Comments on Affordability Investigation

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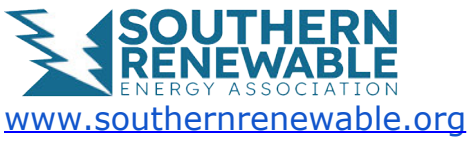
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Good afternoon,

Please see attached the Southern Renewable Energy Association's Comments in Case No. 2026-00185 - Electronic Investigation into the Affordability of Electric and Natural Gas Utility Service and Related Matters.

Sincerely,

Addison Taylor | Regulatory Associate
Southern Renewable Energy Association
addison@southernrenewable.org





Southern Renewable Energy Association

11610 Pleasant Ridge Rd., Suite 103 #176, Little Rock, AR 72223

September 25, 2026

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

Chair Angie C. Hatton
Commissioner Marie Pat Regan
Commissioner Andrew W. Wood
Commissioner Barry L. Mayfield
Executive Director Linda Bridwell

Comments Re: Case No. 2026-00185 - Electronic Investigation into the Affordability of Electric and Natural Gas Utility Service and Related Matters

Dear Chair Hatton and Members of the Kentucky Public Service Commission:

The Southern Renewable Energy Association (“SREA”) files these initial comments in response to the Commission’s August 26, 2026, Order establishing an investigation for issues related to the affordability of electric and natural gas utility service. This Order provides an opportunity for electric and natural gas utilities and stakeholders to identify and discuss concerns and propose potential measures to improve the affordability of electric and natural gas utilities for Kentucky ratepayers.

SREA is a non-profit trade association that works to promote the responsible development and use of utility-scale wind energy, energy storage, solar energy and transmission throughout the South, including in Alabama, Arkansas, Georgia, Kentucky, Louisiana, Mississippi, and Tennessee. SREA members include businesses that develop, own, and operate generation, transmission, and storage facilities that provide energy and capacity, including in Kentucky. SREA’s members also include customers who desire to have more access to affordable, clean, and renewable sources of energy and a more robust transmission grid.

According to recent data from the Energy Information Administration, average Kentucky electric rates for all industries is slightly over 11 cents per kilowatt hour (kWh), earning the state the 10th lowest electric rates in the country for June 2026.¹ As of 2025, Kentucky relied on coal for 66 percent of its power generation, followed by 24 percent from natural gas.² However, states like Oklahoma, Texas, Arkansas, and Louisiana all currently have lower total rates than Kentucky. To make these sorts of comparisons more valuable to this proceeding, the Commission may need data from jurisdictional utilities for the past few years along with forecasts into the near future.

¹ Energy Information Administration, Electric Power Monthly, Form 860m, Table 5.6.A. Average Price of Electricity to Ultimate Customers by End-Use Sector, by State, June 2026 and 2025 (Cents per Kilowatthour)

https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a

² EIA-923 Power Plant Operations Report (released: 9/14/2026)

https://www.eia.gov/electricity/data/state/annual_generation_state.xlsx



Southern Renewable Energy Association

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In accordance with the directives in the Order, below are the issues that SREA believes should be examined throughout this investigation to ensure affordable energy for Kentucky ratepayers:

Issue 1: Competitive Procurement for Generation. Utility conduction of transparent and competitive solicitations in order to evaluate all viable generation and storage technologies for meeting load growth and ratepayer demand. Additionally, Commission ability to establish an annual procurement framework for incremental capacity, including the consideration of affordable and reliable renewable energy and storage resources.

Issue 2: Customer-Driven Generation Access. Prioritization of programs that provide commercial, industrial, and residential customers direct access to low-cost, utility-scale renewables, which will enhance ratepayer choice and reduce overall energy costs.

Issue 3: Generation Diversification. Expansion and diversification of Kentucky's resource mix with low-cost renewable energy resources and storage and its ability to hedge against fossil fuel price volatility, load growth uncertainty and deliver long-term rate stability.

Issue 4: Market Structure and Regional Transmission Operator Membership. Kentucky utility evaluation and pursuance of membership in an RTO, as a directive by the Commission. RTO integration ensures access to wholesale energy markets, reduces unnecessary investments in redundant reserve capacity, enhances grid reliability, and broadens access to diverse, low-cost renewable energy resources.

Also in accordance with the directives in the Order, below are the topics that SREA believes should be discussed at any upcoming technical conferences:

- Topic: Cost of Service Ratemaking Mechanisms
- Topic: Fuel Adjustment Clauses and Risk Hedging Strategies
- Topic: Southeastern Energy Exchange Market Performance and Volatility
- Topic: Regional Transmission Expansion Planning
- Topic: Integrated Resource Planning Reform

SREA appreciates the opportunity to provide these comments to the Commission and respectfully requests that the Commission consider the issues and topics described above for any upcoming technical conferences or stakeholder meetings.

Sincerely,

Southern Renewable Energy Association

/s/ Addison Taylor

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