



25 June 2026

Rachael Hamilton, Director, and Stephen Sullivan, Board Chair  
Metro Louisville Air Pollution Control District  
701 West Ormsby St, Suite 303  
Louisville, KY 40203-3137

RE: Two Proposed Title V Construction Permits at LG&E Mill Creek Generating Station

Dear Ms. Hamilton and Mr. Sullivan,

The growing Louisville Climate Action Network (LCAN) consists of 68 entities—36 non-profit groups, 17 for-profit businesses, 11 faith-based organizations and four educational institutions—as well as 3,000+ individuals, all concerned about global climate change, public health and affordability. Nearly all of our members are LG&E-KU customers.

On behalf of the above members, **LCAN requests that Metro Louisville Air Pollution Control District (APCD) reject the proposed pair of Title V construction permits for the Mill Creek Generating Station (MC Unit), for the following reasons:**

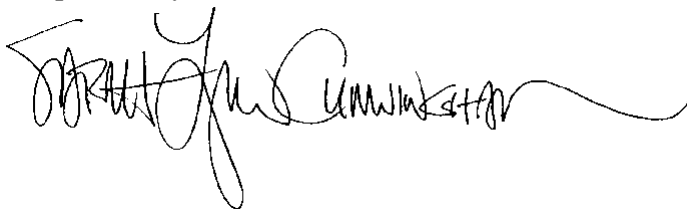
1. **MC Unit #2 is coal-fired and outdated, lacks modern pollution controls for criteria air pollutants, is a significant source of greenhouse-gas pollutants and should be retired immediately.** MC Unit #1 was retired in 2024, but MC Unit #2 remains on-line and lacks modern pollution controls. Extending its operation means avoidable pollution into Louisville's air.
2. **MC Unit #1's closure should have reduced pollution. However, with the other units operating more heavily to make up for MC Unit #1, overall pollution is worse than it was before.** Unit #1 and Unit #2 were so dirty, they could not operate simultaneously; running MC Unit #2 more than previously means a net emission increase in pollution.
3. **MC Unit #2's extended operation locks in avoidable pollution for years.** Keeping MC Unit #2 online through 2031 extends emissions of nitrogen oxides, sulfur dioxide, particulate matter, and greenhouse gases. These are avoidable emissions that will continue to impact public health in Louisville if MC Unit #2 remains in service.

**I can, you can,  
Louisville CAN!**

Louisville Climate Action Network  
P.O. Box 4594, Louisville, KY 40204  
502-451-COOL (2665) [LouisvilleCAN.org](http://LouisvilleCAN.org)

4. **LG&E is seeking to extend MC Unit #2's life without full environmental accountability.** LG&E is proposing to keep MC Unit #2 operating until at least 2031, when yet another new proposed unit (MC Unit #6) would come online. This change in previous commitments extends the life of an old, dirty unit for several years beyond its original retirement date. Mill Creek's emissions matter because Louisville is in a nonattainment area for ozone per federal air-quality standards. Keeping MC Unit #2 online directly worsens ongoing public health and regulatory harms.
5. **The construction of MC Unit #5 and MC Unit #6 at the same facility should be treated as one, combined project.** MC Unit #5 (approved in 2024) and the proposed MC Unit #6 are part of a broader, inter-connected plan for the single Mill Creek facility. Presenting them separately doesn't change the fact that they are parts of one, long-term strategy—that also would **blow a hole in the parent company's stated climate action goals as well as the Metro Council's Resolution No. R-102-19, calling for Louisville to operate on 100% renewable energy.** The two proposals should be evaluated via a single permitting framework.
6. **Splitting MC Unit #5 and MC Unit #6 appears designed to avoid major New Source Review.** By separating MC Unit #5 and MC Unit #6 into different permitting actions, the company is able to argue that neither triggers major New Source Review (NSR). This trick would limit the level of environmental review and avoid stronger pollution-control requirements that would apply if the projects were evaluated together. Utilities ought not be allowed to game the system.
7. **LG&E could facilitate the powering of hyper-scale data centers via renewable power,** as is being built now in Jeffersonville, Indiana, for META, just across the river from Louisville. Why not here?

Cooperatively,

A handwritten signature in black ink, appearing to read 'Sarah Lynn Cunningham', with a long, sweeping horizontal line extending to the right.

Sarah Lynn Cunningham, PE, Executive Director,  
Louisville Climate Action Network