

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

JEFF M. SHORT

COMPLAINANT

V.

KENTUCKY UTILITIES COMPANY

DEFENDENT

)  
)  
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)  
) CASE NO.  
) 2013-00287  
)  
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**MOTION OF JOSHUA BILLS  
FOR FULL INTERVENTION**

Comes Joshua Bills, a party to Administrative Case 2008-00169, *Interconnection and Net Metering Guidelines for Retail Electric Suppliers and Qualifying Customer-Owned Generators*, respectfully moving to intervene into the above-captioned proceeding as a full party. I respectfully request to be accorded the rights and privileges of a full intervenor in these proceedings, and in support thereof, state as follows:

1. Intervention in formal proceedings before the Kentucky Public Service Commission ("Commission") is governed by 807 KAR 5:001 Section 4(11)(a), which provides in relevant part that:

In a formal proceeding, a person who wishes to become a party to a proceeding before the commission may, by timely motion, request that leave to intervene be granted. The motion shall include the movant's name and address and shall state his or her interest in the proceeding and how intervention is likely to present issues or develop facts that will assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.

807 KAR 5:001 Section 4(11)(a).

2. In addition to being a party to Case 2008-00169, I have extensive historical experience with net metering in Kentucky, having intervened in the KU/LG&E pilot net metering tariff in 2001 (Case 2001-00304), and the Berea College Utilities net metering tariff proposal in 2003 (Case 2003-00010). Additionally, I bring to this case my experience as a solar installer for the first net metering project in the Commonwealth in Mt. Vernon under KU/LG&E pilot net metering tariff in 2002. The installation was a pilot demonstration located at the headquarters of Appalachia-Science in the Public Interest, a non-profit public interest group dedicated to appropriate technology utilization in Central Appalachia. That installation was the seed that spurred the development of Kentucky legislation for net metering applying to non-TVA investor owned utilities and rural electric cooperatives in 2004.

3. No schedule has been established for the case, so there is no prejudice to any party from the grant of full intervention rights to him.

4. The grant of intervention to a person pursuant to 807 KAR 5:001 is within the sound discretion of the Commission, and requires that the person “state his or her interest in the proceeding.”

5. In addition to being a certified Solar PV Installer by the North American Board of Certified Energy Practitioners (NABCEP) and a Certified Energy Manager, I am an energy specialist and former solar installer, currently employed at the Mountain Association for Community Economic Development (MACED). I have a long-standing special interest and a unique background of experience in the utilization of net metering to encourage deployment of distributed renewable energy. I reside at 1058 Big Hill Road in Berea, Madison County, KY 40403.

6. As noted above, I am an energy specialist with MACED, which is a 36-year-old nonprofit organization that works in eastern Kentucky and Central Appalachia to create economic opportunity, strengthen democracy and support sustainable use of natural resources. I (intervening as an individual and not on behalf of MACED) am responsible for directing Energy Efficient Enterprises (E3), a program designed to enhance the financial strength of businesses and organizations and to benefit the natural environment by helping enterprises realize cost savings through the use of energy efficient equipment and renewable energy resources.

7. With rising energy prices, many companies are paying more for electricity. This vital input is cutting into profit margins and weakening the ability of businesses to invest in their futures. In addition, growing awareness of the effects of carbon dioxide on climate change has spurred some businesses to seek ways to reduce emissions through greater energy efficiency and the adoption of renewable energy sources such as wind, solar and low impact hydro-electric power. In response, the E3 program provides on-site energy assessments, followed by recommendations for change and assistance with identifying and choosing independent vendors and installation contractors. MACED provides financing for identified improvements at low rates and flexible terms for each enterprise.

8. Existing parties to the proceeding do not adequately represent my interest and historical background that I believe the commission will appreciate in grasping the full intent of net metering legislation in Kentucky towards promoting renewable energy customer-generation in the Commonwealth up to a limit of 1 percent of each utilities annual peak generation. Only at that point does the legislation give room for the commission to consider limiting the obligation of the supplier to offer net metering to

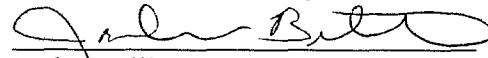
new customer-generators. The “binning” of net excess generation kWhs is in direct conflict of this promotion since solar in particular is the most widely used net metering resource in Kentucky and inherently produces during the day, while most customer-generators consume throughout the day and night. No current party represents the specific interests of an energy specialist with first-hand experience in using the net metering interconnection process to connect a PV system to the grid. I also bring to the case the perspective of a non-profit economic development advisor specializing in use of renewable energy to strengthen the economic performance of businesses in the Appalachian region.

9. 807 KAR 5:001 Section 4(11)(a) provides that the motion to intervene shall state "his or her interests in the proceeding and how intervention is likely to present issues or develop facts that will assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings[.]" My interests are directly germane to the subject matter of this proceeding and are not adequately represented, as discussed above. Alternatively, full intervention should be granted since my participation would assist the commission in fully considering the subject matter of this complaint case without unduly complicating or disrupting the proceeding.

WHEREFORE, for the reasons stated above, and because the special interests I have are not adequately represented by existing parties, and additionally in order to provide the Commission with information and direct experience that will assist the Commission in fully considering the net metering issue raised by “binning” credits to a specific time of day. I request to be accorded the status of full Intervenor, and that each party to the case be directed to serve upon me all pleadings and information

requests that are filed in this case.

Respectfully submitted,



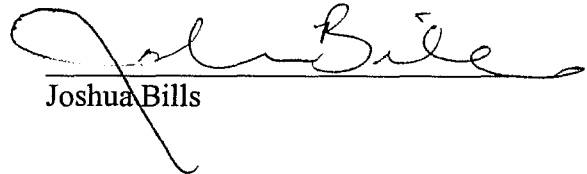
Joshua Bills  
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Berea, KY 40403  
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#### CERTIFICATE OF SERVICE

I certify that an original and ten (10) copies of this Motion for Full Intervention were filed by priority mail to the Docket Clerk, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 and that a true and accurate copy of the foregoing was mailed via first class U.S. Mail, postage prepaid, this 31<sup>st</sup> day of August, 2013, to the following:

Jeff Short  
9180 KY Hwy 78  
Stanford, KY 40484

Ed Staton  
VP – State Regulation and Rates  
220 West Main Street  
Louisville, KY 40232-2010



Joshua Bills