COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF)	CASE NO.
INTERCONNECTION AND NET METERING GUIDELINES)	2020-00302
)	

ORDER

On September 24, 2020, this proceeding was established to investigate and potentially modify and update net metering interconnection guidelines, which were last addressed in Case No. 2008-00169.¹ Also in that Order, all Kentucky jurisdictional electric utilities were made parties to this proceeding. The following parties are intervenors in this matter: Kentucky Industrial Utility Customers (KIUC); the Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General); Kentucky Solar Industries Association, Inc. (KYSEIA); and Mountain Association and Earth Tools, Inc. (jointly, MA/ETI).

During the pendency of Case No. 2019-00256,² a recent proceeding to address legislation that amended the statutory requirements for the net metering of electricity, several commenters opined that the net metering interconnection guidelines should be updated. In light of the relevant information contained in the record of that proceeding,

¹ Administrative Case No. 2008-00169, *Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity Up to Thirty Kilowatts* (Ky. PSC Jan. 8, 2009).

² Case No. 2019-00256, *Electronic Consideration of the Implementation of the Net Metering Act* (Ky. PSC Dec. 18, 2019).

the Commission, on its own motion, finds that the record of Case No. 2019-00256, should be incorporated by reference into this proceeding.

To assist the Commission in its investigation, the Commission further finds that the parties should file, within 30 days of the date of this Order, a written brief discussing current and reasonably anticipated issues and concerns identified by each party regarding net metering interconnection guidelines, and, separately, current and reasonably anticipated concerns regarding Federal Regulatory Energy Commission (FERC) Order No. 2222.³ Because the parties represent a variety of interests, gathering such information may be productive in evaluating existing interconnection guidelines, identifying necessary modifications and best practice considerations, and analyzing the physical and operational impact of FERC Order No. 2222.

IT IS THEREFORE ORDERED that:

- 1. The case record, including public comments, of Case No. 2019-00256 is incorporated by reference into the case record of this proceeding.
- 2. Within 30 days from the date of this Order, each party shall file a written brief setting forth current and reasonably anticipated issues and concerns identified by each party regarding net metering interconnection guidelines and FERC Order No. 2222.

Case No. 2020-00302

³ FERC Order No. 2222, Final Rulemaking, Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators, 172 F.E.R.C. ¶ 61,247 (Sept. 17, 2020) (to be codified at 18 CFR part 35).

By the Commission

ENTERED

FEB 16 2021

rcs

KENTUCKY PUBLIC SERVICE COMMISSION

ATTEST

Executive Director

For

Case No. 2020-00302

*Allison Coffey Nolin R.E.C.C. 411 Ring Road Elizabethtown, KY 42701-6767 *Big Sandy R.E.C.C. Big Sandy R.E.C.C. 504 11th Street Paintsville, KY 41240 *Clayton O Oswald Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447

*Alan Q. Zaring Attorney at Law Zaring & Sullivan Law Office, PSC P.O. Box 226 New Castle, KENTUCKY 40050 *Barry L Myers Manager Taylor County R.E.C.C. 625 West Main Street P. O. Box 100 Campbellsville, KY 42719 *Honorable David A Smart Attorney at Law East Kentucky Power Cooperative, Inc. P. O. Box 707 Winchester, KY 40392-0707

*Honorable Allyson K Sturgeon Managing Senior Counsel - Regulatory & LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202 *Taylor County R.E.C.C. Taylor County R.E.C.C. 625 West Main Street P. O. Box 100 Campbellsville, KY 42719 *David S Samford Goss Samford, PLLC 2365 Harrodsburg Road, Suite B325 Lexington, KENTUCKY 40504

*L Allyson Honaker Goss Samford, PLLC 2365 Harrodsburg Road, Suite B325 Lexington, KENTUCKY 40504 *Bradley Cherry Grayson R.E.C.C. 109 Bagby Park Grayson, KY 41143 *David T Royse Attorney At Law Ransdell Roach & Royse PLLC 176 Pasadena Drive, Building I Lexington, KENTUCKY 40503

*Alyssa Kurtz Inter-County Energy Cooperative Corporation 1009 Hustonville Road P. O. Box 87 Danville, KY 40423-0087 *Clay A. Barkley Strobo Barkley PLLC 239 South 5th Street Ste 917 Louisville, KENTUCKY 40202 *J. Hadden Dean Sheehan Barnett Dean Pennington Little & Dexter 116 North Third Street P.O. Box 1517 Danville, KENTUCKY 40423

*Angela M Goad Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204 *Chris Brewer Clark Energy Cooperative, Inc. 2640 Ironworks Road P. O. Box 748 Winchester, KY 40392-0748 *Debbie Gates Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201

*April Renner Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447 *Christen M Blend American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Post Office Box 16631 Columbus, OHIO 43216 *Derrick Dean Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447 *Hon. Derrick Willis Attorney at Law Willis Law Office P.O. Box 1500 Grayson, KENTUCKY 41143 *Honorable Gregory D Allen Collins & Allen Law Office 730 Old Burning Ford Road P.O. Box 475 Salyersville, KENTUCKY 41465 *John G Horne, II Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204

*Honorable David Edward Spenard Strobo Barkley PLLC 239 South 5th Street Ste 917 Louisville, KENTUCKY 40202 *Gregory Mayes Big Rivers Electric Corporation 201 Third Street P. O. Box 24 Henderson, KY 42420 *John J Scott Attorney at Law John J. Scott, P.S.C. 200 Logan Avenue P.O. Box 389 Elizabethtown, KENTUCKY 42702-038

*Devon Woosley Nolin R.E.C.C. 411 Ring Road Elizabethtown, KY 42701-6767 *Isaac Scott Pricing Manager East Kentucky Power Cooperative, Inc. P. O. Box 707 Winchester, KY 40392-0707 *John S Pumphrey Grant, Rose & Pumphrey 51 South Main Street Winchester, KENTUCKY 40391

*Farmers R.E.C.C. Farmers R.E.C.C. 504 South Broadway P. O. Box 1298 Glasgow, KY 42141-1298 *Honorable James M Crawford Crawford & Baxter, P.S.C. Attorneys at Law 523 Highland Avenue P. O. Box 353 Carrollton, KENTUCKY 41008 *Honorable Kurt J Boehm Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202

*William T Prather President & CEO Farmers R.E.C.C. 504 South Broadway P. O. Box 1298 Glasgow, KY 42141-1298 *Doug Hubbard Salt River Electric Cooperative Corp. 111 West Brashear Avenue P. O. Box 609 Bardstown, KY 40004 *Kentucky Power Company Kentucky Power Company 1645 Winchester Avenue Ashland, KY 41101

*Thomas J FitzGerald Counsel & Director Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KENTUCKY 40602 *Fleming-Mason Energy Cooperative, In Fleming-Mason Energy Cooperative, Inc. 1449 Elizaville Road P. O. Box 328 Flemingsburg, KY 41041 *Kenya Stump Executive Director Energy and Environment Cabinet 2 Hudson Hollow Road Frankfort, KENTUCKY 40601

*Jackson Purchase Energy Corporation Jackson Purchase Energy Corporation 2900 Irvin Cobb Drive P. O. Box 4030 Paducah, KY 42002-4030

*Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202 *Katie M Glass Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634 *Kenergy Corp. Kenergy Corp. 6402 Old Corydon Road P. O. Box 18 Henderson, KY 42419 *Mark David Goss Goss Samford, PLLC 2365 Harrodsburg Road, Suite B325 Lexington, KENTUCKY 40504 *Nicky Rapier Director of Business Development Salt River Electric Cooperative Corp. 111 West Brashear Avenue P. O. Box 609 Bardstown, KY 40004

*Duke Energy Kentucky, Inc. Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45202

*J. Michael West Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204 *Patrick Woods East Kentucky Power Cooperative, Inc. P. O. Box 707 Winchester, KY 40392-0707

*Nolin R.E.C.C. Nolin R.E.C.C. 411 Ring Road Elizabethtown, KY 42701-6767 *Michael Hornung Manager, Pricing/Tariffs Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40202 *W. Patrick Hauser Attorney Cumberland Valley Electric, Inc. Highway 25E P. O. Box 440 Gray, KY 40734

*South Kentucky R.E.C.C. South Kentucky R.E.C.C. 200 Electric Avenue Somerset, KY 42501 *Minna Sunderman Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201 *Blue Grass Energy Cooperative Corp. Blue Grass Energy Cooperative Corp. 1201 Lexington Road P. O. Box 990 Nicholasville, KY 40340-0990

*Larisa Vaysman Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201 *Honorable Michael L Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202 *Clark Energy Cooperative, Inc. Clark Energy Cooperative, Inc. 2640 Ironworks Road P. O. Box 748 Winchester, KY 40392-0748

*Larry Cook Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204 *Meade County R.E.C.C. Meade County R.E.C.C. P. O. Box 489 Brandenburg, KY 40108-0489 *Cumberland Valley Electric, Inc. Cumberland Valley Electric, Inc. Highway 25E P. O. Box 440 Gray, KY 40734

*Matt Partymiller President Kentucky Solar Industries Association 1038 Brentwood Court Suite B Lexington, KENTUCKY 40511 *Honorable Mark R Overstreet Attorney at Law Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634 *East Kentucky Power Cooperative, Inc East Kentucky Power Cooperative, Inc. 4775 Lexington Road P. O. Box 707 Winchester, KY 40392-0707 *Inter-County Energy Cooperative Corp Inter-County Energy Cooperative Corporation 1009 Hustonville Road P. O. Box 87 Danville, KY 40423-0087 *Salt River Electric Cooperative Corp Salt River Electric Cooperative Corp. 111 West Brashear Avenue P. O. Box 609 Bardstown, KY 40004 *Senthia Santana Big Rivers Electric Corporation 201 Third Street P. O. Box 24 Henderson, KY 42420

*Jerry W. Carter Inter-County Energy Cooperative Corporation 1009 Hustonville Road P. O. Box 87 Danville, KY 40423-0087 *Grayson R.E.C.C. Grayson R.E.C.C. 109 Bagby Park Grayson, KY 41143 *Sheree Gilliam Inter-County Energy Cooperative Corporation 1009 Hustonville Road P. O. Box 87 Danville, KY 40423-0087

*Jackson Energy Cooperative Corporati Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447 *Big Rivers Electric Corporation Big Rivers Electric Corporation 201 Third Street P. O. Box 24 Henderson, KY 42420 *Kentucky Utilities Company Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

*Ryan Henderson Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447 *Roger R Cowden Senior Corporate Counsel East Kentucky Power Cooperative, Inc. 4775 Lexington Road P. O. Box 707 Winchester, KY 40392-0707 *Louisville Gas and Electric Company Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

*Licking Valley R.E.C.C. Licking Valley R.E.C.C. P. O. Box 605 271 Main Street West Liberty, KY 41472 *Robin Slone Big Sandy R.E.C.C. 504 11th Street Paintsville, KY 41240 *Tyson Kamuf Corporate Attorney Big Rivers Electric Corporation 201 Third Street P. O. Box 24 Henderson, KY 42420

*Owen Electric Cooperative, Inc. Owen Electric Cooperative, Inc. 8205 Highway 127 North P. O. Box 400 Owenton, KY 40359 *Robert Spragens, Jr. Spragens & Higdon, P.S.C. 15 Court Square P.O. Box 681 Lebanon, KENTUCKY 40033 *Woodford L Gardner, Jr. Richardson Gardner & Alexander 117 East Washington Street Glasgow, KENTUCKY 42141

*Shelby Energy Cooperative, Inc. Shelby Energy Cooperative, Inc. 620 Old Finchville Road Shelbyville, KY 40065 *Randal A. Strobo Strobo Barkley PLLC 239 South 5th Street Ste 917 Louisville, KENTUCKY 40202