

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO MOUNTAIN ASSOCIATION AND EARTH TOOLS, INC

Mountain Association and Earth Tools, Inc (jointly, Joint Intervenors), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 23, 2026. The Commission directs Joint Intervenors to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

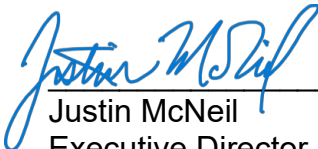
For any request to which Joint Intervenors fails or refuses to furnish all or part of the requested information, Joint Intervenors shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Joint Intervenors shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Joint Intervenors' Brief at 5.<sup>2</sup> Assuming the Commission uses the current net-metering guidelines as a starting point, explain what Joint Intervenors view as the most important updates needed from the Model Interconnection Procedures, 2023 Edition. In the explanation, include specific citations to the corresponding sections in the Model Interconnection Procedures.

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<sup>2</sup> Brief of Joint Intervenors Mountain Association and Earth Tools, Inc. (filed Apr. 19, 2021).

  
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DATED OCT 08 2026

cc: Parties of Record

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