COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application Of Kentucky Power Company	)
For (1) A General Adjustment Of Its Rates For	)
Electric Service; (2) Approval Of Tariffs And Riders;	)
(3) Approval Of Accounting Practices To Establish	) Case No. 2020-
Regulatory Assets And Liabilities; (4) Approval Of A	) 00174
Certificate Of Public Convenience And Necessity;	)
And (5) All Other Required Approvals And Relief	)

POST-HEARING RESPONSE BRIEF OF JOINT INTERVENORS RELATING TO THE PROPOSED NET METERING II TARIFF OF KENTUCKY POWER COMPANY

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INTRODUCTION

In the Public Service Commission ("Commission") *Order* in this case dated January 13, 2021, the Commission deferred a decision on the Kentucky Power Company ("KPC") proposed Net Metering ("NMS II") tariff, recognizing that as the *first* case in which a jurisdictional electric utility had proposed to depart from the 1:1 net metering formula, a complete evidentiary record was necessary to support any such change.

> Given that this is the first proceeding to propose new net metering rates consistent with the Net Metering Act, the Commission finds that its decision regarding net metering rates should be deferred to allow Commission Staff to work with its consultant to ensure that there is sufficient evidence to support the conclusion that Kentucky Power's proposed Tariff NMS II rates are fair, just and reasonable.

January 13, 2021 *Order,* Case No. 2020-00174, p. 85.

The Commission noted, in reviewing the KPC NMS II tariff, that KPC had failed to account for any of the benefits of net-metered solar in their proposal to value fed-in solar at their "avoided cost" rate. "The proposed calculation did not include the societal cost of carbon, the value of the customer generators' renewable energy credits (RECs), nor other externalities as Kentucky Power contended that those items are not cost of service related." *Id.* at p. 83.

The Commission further noted the lack of data or analysis to support the NMS II rate proposal. "Relevant here, Kentucky Power did not conduct a cost of service study or provide any cost support for serving net metered customers. Instead, Kentucky Power proposed to use avoided cost as the basis for net metering rates. The Commission is not convinced by Kentucky Power's arguments that avoided cost should be the basis for establishing new net metering rates." *Id.*, p. 85.

The Commission issued an *Order* setting the NMS II Tariff issues for hearing beginning on April 6, 2021, *January 15, 2021 Order,* and at the conclusion of the April 7 hearing, established a briefing schedule with opening briefs due April 21, 2021 and with response briefs due on April 26, 2021. This post-hearing Response Brief of Joint Intervenors addresses the requirements of KRS 278.466 and responds to the *Briefs* filed by Kentucky Power Company, and by the Attorney General/Kentucky Industrial Utility Customers. As further discussed below, KPC has yet failed to satisfy the requirements of KRS 278.466 with respect to justifying the NMS II Tariff, and has produced a proposed rate that is unfair, unjust, and unreasonable.

For the reasons stated below and as stated in the initial Post-Hearing Brief of Joint Intervenors and in the Post-Hearing Brief of Joint Intervenors Relating To The Proposed Net Metering II Tariff Of Kentucky Power Company filed herein, which are incorporated herein by reference as if fully set forth below with respect to the net metering issues, the NMS II proposal should be rejected and the 1:1 compensatory rate for NMS I continued in effect (whether expressed as a kilowatt-based or dollar-denominated rate) unless and until a new NMS proposal is presented that both comports with the statute, and which provides compensatory credit rates consistent with the true cost of service after consideration of benefits and costs of such service.

ARGUMENT

1. The Proposed NMS II Tariff Fails To Conform To The Requirements of KRS 278.466 In Failing To Provide Sufficient and Competent Evidence of The Cost Of Serving Customer-Generators Under A Net Metering Relationship

KRS 278.466(5) provides that a utility may propose to implement rates for eligible customer-generators that depart from the traditional 1:1 kilowatt-denominated energy credit:

> Using the ratemaking process provided by this chapter, each retail electric supplier shall be entitled to implement rates to recover from its eligible customer-generators all costs necessary to serve its eligible customer-generators, including but not limited to fixed and demand-based costs, without regard for the rate structure for customers who are not eligible customer-generators.

The record in this case reflects that Kentucky Power Company ("KPC") has not objectively analyzed the actual cost to serve net metering customers, and as a further consequence has not analyzed how decades of solar generation will reduce generation, transmission, and distribution costs in the future. After 17 years of implementing the net metering tariffs developed under KRS 278.465 – 468, and despite the adoption of a statutory amendment to KRS 278.466 in 2019 allowing a utility to propose a rate in a manner consistent with KRS 278.466(5), KPC has neither metered nor generated and used actual load curves to support their proposed NMS II rates using sound Cost Of Service (COSS)-based rate making.

The lack of real load data, which remains fully within the capacity of the utility to collect, and which the utility knew the statute requires, constitutes a significant analytical and rate making flaw because NM customers not only change their load shapes (and in many different ways) through self-generation, they also make significant and valuable injections of energy, capacity, and other benefits *at the distribution level in the system.* The Company *assumes* that NM customer-generators are nothing more than highly-variable wholesale generators in setting the proposed export compensation rate, an unsupported conclusion completely rebutted by the actual studies conducted on the benefits of and proper valuation of rooftop solar across the country and over the past ten years. The Company continues to ignore such studies, which undertake the kind of benefit-cost assessment suggested by Joint Intervenor ("JI")witness Karl Rábago and supported by this Commission in its Letter To Senator Smith regarding setting an appropriate rate schedule for net metering customers:

> [T]he Commission has concerns regarding the language describing what the Commission *shall* consider in reviewing a net metering tariff. **The Commission has broad authority to consider all relevant factors presented during a rate proceeding, which would include evidence of the quantifiable benefits and costs of a net-metered system.**

Smith Letter, at p. 1 (Emphasis added).

Nor has the Company conducted marginal cost of service studies to inform locational and marginal value of usage changes or exports on distribution and transmission infrastructure requirements. Such analyses would not *fully* substitute for a full value analysis or benefit-cost analysis but would at least *begin* to inform the delivery rates the Company should charge and costs which are avoided through distributed generation embedded in the system.

Actual analyses cited by JI witnesses, and those of the Kentucky Solar Energy Industries Association ("KYSEIA") in this proceeding refute the Company's claims of an intra-class subsidy—at least where actual data is used to calculate the value of distributed generation in determining the net cost (if any) of service. The Company's approach rests solely and unreasonably on a single assumption and accompanying arithmetic manipulation: when net metering customers use less electricity than non-generating customers, they are failing to pay the cost of service assumed for non-generating customers, and therefore they are being subsidized more than non-generating customers.

The Company brief is a classic straw man fallacy that seeks to distract attention from the fact that the Company *did not* use standard rate making processes such as load metering and objective cost of service analysis, or a full accounting of future cost of service impacts associated with NEM facility operations. Mr. Rábago did not assert that the Commission should be bound by HFA1, or even that it is necessary—though passage of HFA1 might, in retrospect, have been helpful in forestalling the Company's repeated efforts to deviate from established rate making principles and to ignore consideration of benefits, and its continued reliance on assumptions rather than data in proposing rates. Mr. Rábago [and other JI witnesses] cited the Commission's letter to confirm and align that testimony with the recognition of the plenary rate making authority of the Commission in accordance with such established principles—principles ignored or violated by the Company. The Company also appears to attach great weight to its past practice of failing to rely upon metered data and class- or subclass-specific data in proposing rates. This is not an argument for approval of its flawed NMS proposal but rather is an indictment of the Company's failure to update and modernize its rate making proposal through the use of modern best practices and analysis tools, and of its categorical error in failing to address the fundamental difference presented by customer generators—that some customers now not only exhibit variety in patterns of use, but also change that use through self-generation, and, from time to time, export energy into the grid. The Company's decades-old approaches to rate justification would require the Commission to *not do* something that the NM statute and the Commission's general obligations and duties require—to use sound rate making processes and principles in reviewing a proposed rate for NEM customer generators.

The Company's proposed NMS II tariff rate is built on a foundation of sand. It is the assumption that just and reasonable rates flow from charging NEM customers, and NEM customers only, for electricity they did not use, and to credit fed-in electricity as if it were coming from wholesale generators rather than net-metering customer-generators who do not participate in the wholesale market but rather in a regulated retail environment.

The rate making issue before the Commission cannot, therefore, be resolved merely by finding a middle ground between the confiscatory and unsubstantiated assumptions and assertions of the Company and full retail net metering. The Company's continued refusal to measure and objectively analyze benefits and costs in setting a rate for service of net-metering customers should not induce such a false Solomonic solution of "splitting the difference." KRS 278.466 requires more —it requires reliance on proper rate making procedures that the Company has not employed. Actual measurement of the costs of serving the different kinds of customer generators in its system has not done by the Company, which is the only party that bears the evidentiary burden in this case. The Company has not met that burden of a cost-based analysis despite the Commission clearly indicating that defaulting to "avoided cost" was no surrogate for consideration of "all relevant factors presented during a rate proceeding, which would include evidence of the quantifiable benefits and costs of a net-metered system." *Smith Letter*, *supra,* at p. 1.

2. A Full Cost Of Service Study Did Not Underpin The KPC Proposed NMS II Rate Schedule, Nor Does The Analysis That Was Subsequently Developed And Submitted Constitute A Full Cost of Service Study With Respect To Net Metering Customers

In its Post Hearing Brief, at p. 3, KPC Claims they did in fact do a full CCOS with respect to serving net metering ("NM") customers. Citing the Stegall testimony, KPC claims that the CCOS was legitimate and that the Commission approved how they did CCOS for determining all their other rates. Additionally, KPC justifies not using NM customer load data because it was unavailable and unnecessary. Of course, the Company never installed metering devices at net metered generation facilities or apparently sought to do so.

Witness Inskeep in his *Rebuttal Testimony* at pp. 8-12, makes clear why the CCOS created and advanced long after the NMS II rate schedule was filed by KPC, falls short of the mark. Inskeep explains how KPC created an imaginary NM customer load profile that exaggerates the NM customer load, with especially inflated nighttime loads. Inskeep explains that KPC has argued both that NM customers have an exceptionally high load *and* that their loads are just like every other customer. These problems demonstrate conclusively why mere supposition cannot substitute for metered data in developing just and reasonable rates.

The basis for the Company's assertion that it has fully accounted for the costs and benefits of distributed generation operations and exports is unsupported by actual evidence. The Company did not fully meter NM customers, either before or after the installation and operation of NM facilities. It did not conduct or rely upon a cost of service study or develop data-specific and representative load curves for its actual NM customers. It did not start the process to estimate marginal distribution and transmission avoided capacity and energy costs by conducting a marginal cost of service study. It ignored the principles, process steps, and most of the impacts identified as best practices by the National Standard Practice Manual for Benefit-Cost Assessment of Distributed Energy Resources. It did not follow the open, objective, and stakeholder-informed processes used by the many value of solar studies cited by JIs in this proceeding. It categorically excluded from consideration the value associated with avoided future costs such as generation capacity, environmental compliance costs, the societal costs of climate change, and system resilience threats. It ignored the economic development benefits of distributed generation in the communities it serves.

KPC acknowledges that Tariff NMSII was produced prior to doing the CCOS but claims it was based on sound rate making principles. This approach is indefensible because the statutory basis of any changes to the NM compensation rate is based on the recovery of costs "necessary to serve its eligible customer-generators, including but not limited to fixed and demand-based costs, *without regard for the rate structure for customers who are not eligible customer-generators."* KRS 278.466(5) (Italics added). It is inconsistent with sound ratemaking principles and is a slippery slope to propose a new rate prior to doing the CCOS, and invites *post hoc* rationalization of previously-selected rates rather than robust independent analysis of the true cost of serving this discrete group of customers.

3. The KIUC/Attorney General's Position Regarding The Proposed NMS II Tariff Is Inconsistent With The Governing Statutes

The Office of the Attorney General and KIUC ("AG/KIUC") have filed a joint brief in support of the proposed KPC NMS II Tariff. In it, AG/KIUC argue that the tariff should be approved because "net metering customers should not be overcompensated at the expense of other retail customers;" that the Company's NMS II proposal is "favorable" to net metering customers; that "no other party has prepared a cost of service study supporting an alternative compensation rate in this matter;" and that "NMS II is consistent with the plain language of KRS 278.466."

Addressing each issue in turn, beginning with the third justification, no one other than perhaps an unrepentant Silas Marner would consider the devaluation by some 75% of the compensatory credit for fed-in electricity from a rooftop solar system to be "favorable to net metering customers."

With respect to the consistency with KRS 278.466, it is only by selectively ignoring the plain language of the statute that one could arrive at that conclusion, since it is apparent from KRS 278.466(5) that any alternative rate schedule for net metering customers must be based on very specific requirements:

> Using the ratemaking process provided by this chapter, each retail electric supplier shall be entitled to implement rates to recover from its eligible customer-generators all costs necessary to serve its eligible customer-generators, including but not limited to fixed and demand-based costs, without regard for the rate structure for customers who are not eligible customer-generators.

KRS 278.466(5). Absent a full Cost of Service Study utilizing competent and sufficient data specific to the costs of serving net metering customers, the proposed NMS II rate schedule fails to accord with the "plain language of the statute."

A reading of KRS 278.466 that would allow the utility proposing to replace the 1:1 kilowatt-denominated compensatory rate with a different rate *without* such a study, is inconsistent with the statute read as a whole. For while a strained and isolated interpretation of KRS 278.466(3) might be used to argue that the setting of the compensatory rate for fed-in electricity is *different* from the rate recovery authorized in KRS 278.466(5), they are part and parcel of the *same* rate structure for net metering customers and cannot be determined in a vacuum one from the other.

The Commission understood this in the letter communicating concerns regarding a House Floor Amendment offered by Representative DuPlessis, to SB 100. In the interests of presenting a less selective and less revisionist history of the development of SB 100, that letter is reprinted below in full:

> February 18, 2019
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> **VIA EMAIL**
>
> Senator Brandon Smith
> Chair, Natural Resources
> and Energy Committee
> 702 Capital Avenue
> Annex Room 252
> Frankfort, KY 40601
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> Re: Senate Bill 100, House Floor Amendment 1
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> Dear Senator Smith:
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> Because of the extensive changes to Senate Bill 100 (SB 100) adopted by the House of Representatives in House Floor Amendment 1 (HFA 1), the Public Service Commission is compelled to oppose the bill. As explained in our Feb. 14, 2019 letters to you and Rep. Gooch, the original language in SB 100 would have established a practical approach to addressing a utility's compensation for net-metered systems through the ratemaking process. In its current form, however, SB 100 is fatally flawed.
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> First, there are the procedural challenges presented by the provision in HFA 1 requiring the establishment of a ratemaking proceeding before the Commission no later than one

> year from the effective date of the Act. The Commission does not have sufficient staff to adequately conduct concurrent ratemaking proceedings for all retail electric suppliers during such a compressed timeframe. Utilities and the territories they serve have quite distinct differences, and it is because of these variations that the ratemaking process should reflect a utility's unique characteristics and the specific cost of serving that utility's customers. **The same holds true for examining the quantifiable benefits and costs of net-metered systems.** Attempting to rush the consideration of these issues within an artificially compressed timeframe or trying to force the Commission to address the issue for all electric utilities and customer-generators in one administrative case, as HFA 1 appears to be aimed at doing, is not in the best interests of ratepayers or any other stakeholder.
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> Second, the Commission has concerns regarding the language describing what the Commission *shall* consider in reviewing a net metering tariff. **The Commission has broad authority to consider all relevant factors presented during a rate proceeding, which would include evidence of the quantifiable benefits and costs of a net-metered system.** S*ee Kentucky Public Service Com'n v. Commonwealth ex rel. Conway*, 324 S.W.3d 373, 383 (Ky. 2010) (The Commission has "plenary authority to regulate and investigate utilities and to ensure that rates charged are fair, just, and reasonable under KRS 278.030 and KRS 278.040."). Benefits of generation from net-metered systems vary for a number of reasons, including locational benefits, specific utility load factors, etc. Statutory language explicitly dictating *only* what the Commission is to consider in a rate proceeding (as HFA 1 does in Section 2, paragraph 5) is antithetical to standard principles of utility ratemaking.
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> * * *
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> The original provisions of Senate Bill 100 create a transparent process that would have allowed broad participation among all stakeholder interests with the ability of the Commission to fulfill its statutory directive to establish rates that are fair, just, and reasonable to all ratepayers. Unfortunately, instead of permitting the Commission to conduct proceedings addressing net-metered systems using establish principles of utility ratemaking, the provisions of HFA 1 create a process that appears to favor the interests of a particular group over other stakeholders, including ratepayers. As such the Commission requests that the Senate reject HFA 1 to Senate Bill 100.

Letter from Public Service Commission to Senator Brandon Smith, February 18, 2019. (Emphasis added). ("Smith Letter").[1]

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[1] The Commission can take official notice of the existence and contents of the Letter. It is also attached as Attachment 1 to the Preliminary Comments of the Kentucky Resources Council in *In the Matter Of: Electronic Consideration of the Implementation Of The Net Metering Act,* Case No. 2019-00256, the record of which has by Order of the Commission been incorporated into this case.

The amount of compensatory credit to be afforded to the customer-generator is not a determination that can be made in the absence of consideration of the value derived by the utility and other customers from the addition of that renewable energy into the grid. Nor can the cost of service be parsed absent a consideration of factors that offset the gross cost by providing quantifiable benefits that lower the real or net cost of service (or which may offset such cost entirely). The AG/KIUC suggestion that net-metering customers are over-compensated lacks any competent evidence in the record based on actual costs of service and quantification of actual benefits derived from such customers. If one assumes that the costs of service for net metering customers and non-participating customers are the same, that the load values are equivalent, and that there is no value to fed-in solar, then and only then one can assert that the difference in energy usage between the net-metering customer and the non-participating customer constitutes a subsidy to NM customers. Nowhere else in the field of utility rate design, is a ratepayer punished for conserving energy by being required to pay for energy that the ratepayer has not consumed.

The absence of a competent cost of service study, and complete failure to consider and appropriately assign value to those benefits identified by witnesses for the JIs and KYSEIA, benefits identified by the Commission in the *Smith Letter*, requires that the proposed tariff be rejected.

As to whether the statute allows a continuation of the kilowatt-denominated compensatory credit, the Commission could convert the kilowatt-denominated credit to a dollar-denominated credit at a 1:1 ratio and satisfy the statute.

Finally, KRS 278.466 does not alter the burden on KPC to justify a proposed net metering rate schedule as being fair, just, and reasonable. The suggestion by AG/KIUC that the

Commission should accept the flawed and belatedly-crafted COSS because "no other party has prepared a cost of service study supporting an alternative compensation rate in this matter" is quite simply absurd. It is not the burden of any party other than the utility proposing a new tariff under KRS 278.466, to justify the basis for the proposed recovery of costs with a valid study.

4. The "Grandfathering" Provided in KRS 278.466 Applies to The Customer-Generator And Not, As Suggested By KPC, To The Equipment Installed By That Customer

In its *Memorandum Brief Of Kentucky Power Company Regarding Tariff NMS II* at p.12, KPC claims grandfathering refers to the "generating equipment," and not the customer-generator. KPC's suggested reading is inconsistent with the plain language of the statute. KRS 278.466(6) provides in full that:

> (6) For an eligible electric generating facility in service prior to the effective date of the initial net metering order by the commission in accordance with subsection (3) of this section, the net metering tariff provisions in place **when the eligible customer-generator began taking net metering service**, including the one-to-one (1:1) kilowatt-hour denominated energy credit provided for electricity fed into the grid, shall remain in effect at those premises for a twenty-five (25) year period, regardless of whether the premises are sold or conveyed during that twenty-five (25) year period. **For any eligible customer-generator to whom this subsection applies**, each net metering contract or tariff under which the customer takes service shall be identical, with respect to energy rates, rate structure, and monthly charges, to the contract or tariff to which the same customer would be assigned if the **customer were not an eligible customer-generator**.

KRS 278.466(6) (Emphasis added).

Irrespective of whether equipment needs to be replaced or not during that 25-year period, and irrespective of whether the premises is sold or conveyed, the 25-year "grandfathering" period provided by statute applies to the "eligible customer-generator."[2]

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[2] Since there has been a significant amount of revisionism in the KPC presentation of the legislative history of SB 100, the Joint Intervenors suggest that perhaps revisiting the floor presentation of SB 100 in the Senate Chamber by the bill sponsor, Senator Brandon Smith, would illuminate both the issues of whether it was contemplated by the bill's sponsor that *benefits* would be considered in determining the net cost of service, and whether the grandfather provision was intended to protect the eligible customer-generator and not the equipment that had

5. Other Issues Relating To KPC Proposed Net Metering Tariff And Related Interconnection Guidelines

KRS 278.466(2) provides in full that:

> Each retail electric supplier serving a customer with eligible electric generating facilities shall use a standard kilowatt-hour meter capable of registering the flow of electricity in two (2) directions. Any additional meter, meters, or distribution upgrades needed to monitor the flow in each direction shall be installed at the customer-generator's expense. If additional meters are installed, the net metering calculation shall yield the same result as when a single meter is used.

During cross examination of witness Blankenship, the witness indicated that KPC's standard AMR meter cannot be used to implement NMS II because it cannot record bi-directional flow and time-of-use simultaneously. While AMI meters can do both functions simultaneously, the PSC denied approval of AMI deployment due to a failure of the company to make the case for granting a CPCN. KPC's proposed workaround is to use one of two alternative meters which can record bi-directional flow and TOU – one that requires manual reading and the other that uses cellular communication. In its post-hearing brief, at p. 17, KPC states they have some 300 such meters in inventory.

KRS 278.466(2) requires that "[e]ach retail electric supplier serving a customer with eligible electric generating facilities shall use a standard kilowatt-hour meter capable of registering the flow of electricity in two (2) directions." The NMS II rate design fails to comply

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been installed. The KET videotape of the deliberations of the Kentucky Senate Chamber on SB 100 on February 13, 2019 can be found here, beginning at 4:58 in Part 2 of the Senate session that day:
https://www.ket.org/legislature/archives/?nola=WGAOS+020054&stream=aHR0cHM6Ly81ODc4ZmQxZWQ1NDIyLnN0cmVhbWxvY2submV0L3dvcmRwcmVzcy9fZGVmaW5zdF8vbXA0OndnYW9zL3dnYW9zXzIyMDA1NC5tcDQvcGxheWxpc3QubTN1OA%3D%3D&part=2

The specific discussion of the grandfather provision is located at 11:37 through 12:45, and underscores that the intent was to create to protect the people – the eligible customer-generators, and not the equipment.

with statute, by requiring installation of a special new meter capable of both bi-directional and TOU functionality. KPC keeps only about 300 in stock, out of over 100,000 meters in use for residential customers, making the implementation of the NMS II tariff unworkable and inconsistent with the statutory obligation of the utility.

Regarding the proposed increase in fees for Level I & II applications, the proposals should be rejected as being inconsistent with the Kentucky Net Metering and Interconnection Guidelines, in which a consensus workgroup proposed and the Commission determined that there should be no fee for Level I and limited fees for Level II. Those standard Guidelines apply to all regulated utilities and by their terms were intended to facilitate the use of NM and interconnection. They cannot lawfully be changed in an *ad hoc* fashion by a utility. Any changes to Interconnection application fees should be addressed in the current administrative case that addresses updating the Interconnection Guidelines.

PRAYER FOR RELIEF

For the reasons stated herein, Joint Intervenors respectfully request that the Commission:

1. Reject the proposed NMS II Tariff; and

2. For any and all other relief to which Joint Intervenors may appear entitled.

Respectfully submitted,

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Certificate of Service

This is to certify that the electronic version of the foregoing *Post-Hearing Response Brief of Joint Intervenors Relating To The Proposed Net Metering II Tariff Of Kentucky Power Company* is a true and accurate copy of the same document that will be filed in paper medium; that the electronic filing has been transmitted to the Commission on April 26, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that in accordance with the March 16, 2020 Commission Order in Case No. 2020-00085 an original and ten copies in paper medium of this filing will not be mailed until after the lifting of the current state of emergency.

Tom FitzGerald