

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	)	CASE NO.
PRACTICES TO ESTABLISH REGULATORY	)	2020-00174
ASSETS AND LIABILITIES; (4) APPROVAL OF	)	
A CERTIFICATE OF PUBLIC CONVENIENCE	)	
AND NECESSITY; AND (5) ALL OTHER	)	
REQUIRED APPROVALS AND RELIEF	)	

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.  
MOTION TO INTERVENE**

Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and moves for leave to intervene into the instant case. In support of its motion to intervene, KYSEIA states the following.

1. KYSEIA is the assumed name of the Kentucky Solar Industries Association, Inc., a Kentucky nonprofit in good standing with the Kentucky Secretary of State.
2. KYSEIA’s mailing address, electronic mail address, and other contact information:

Kentucky Industries Solar Association, Inc.  
ATTN: Matt Partymiller  
1038 Brentwood Court, Ste. B  
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matt@solar-energy-solutions.com

3. The purpose of KYSEIA includes, among other things, promoting the exchange of knowledge for solar energy and advocate on behalf of solar energy constituents and members. KYSEIA will participate in this proceeding through:

- a. Matt Partymiller, President of KYSEIA. KYSEIA has special and distinct interests on behalf of its members, including its specific members below, but also as a solar association that represents solar companies that must disseminate information and calculate costs and rates of return based upon Kentucky Power’s net metering tariff and the interconnection of systems.
- b. Artie Ann Bates, a member of KYSEIA and a Kentucky Power Company (Kentucky Power) customer receiving electric service under Kentucky Power’s “Tariff N.M.S. (Net Metering Service)” (Tariff N.M.S.). Bates also intends to modify her current system and may construct and net meter on additional systems in the future. Bates intends to receive electric service under a net metering tariff beyond the 25-year grandfathering period on her current system and any future systems including modified systems.
- c. Appalshop, Inc., a Kentucky nonprofit in good standing with the Kentucky Secretary of State and a member of KYSEIA and a Kentucky Power customer receiving electric service under Kentucky Power’s Tariff N.M.S. Appalshop may also modify its current system and may construct and net meter on additional systems in the future. Appalshop intends to receive electric service under a net metering tariff beyond the 25-year grandfathering period on its current system and any future systems including modified systems.
- d. Annie’s Frugal Finery, LLC (“AFF”), a Kentucky limited liability company in good standing with the Kentucky Secretary of State and a member of KYSEIA and a Kentucky Power customer receiving electric service under Kentucky Power’s Tariff N.M.S. AFF may also modify its current system and may construct and net

meter on additional systems in the future. AFF intends to receive electric service under a net metering tariff beyond the 25-year grandfathering period on its current system and any future systems including modified systems.

4. Kentucky Power states: “As of the end of the test year, the Company has 44 net metering customers, all of whom are using solar generation systems.”<sup>1</sup> These net metering customers receive service under Tariff N.M.S., a tariff unique to net metering customers; accordingly, their interests are not similar to other customers who receive service under other Kentucky Power tariffs.
5. Through the pending application, Kentucky Power proposes to close Tariff N.M.S. to all new customers as of January 1, 2021.<sup>2</sup> Additionally, Kentucky Power seeks approval of “Tariff N.M.S. II (Net Metering Service II)” (Tariff N.M.S. II), which will which will apply to all new net metering service customers as of January 1, 2021.<sup>3</sup> The interests of applicants for service under Tariff N.M.S. and the proposed Tariff N.M.S. II are not similar to other customers who apply for service under other Kentucky Power tariffs.
6. Kentucky Power also proposes to modify interconnection procedures and fees through the proposed net metering tariff. KYSEIA has a special and distinct interest in these interconnection procedures and fees, as it not only represents customer generators and potential customer generators who are subject to those procedures and fees, it also represents the solar companies that will ultimately be assisting these customers and potential customers in complying with those interconnection procedures and applications.

<sup>1</sup> Application, Section III, Vol. 1 of 2, Direct Testimony of Alex E. Vaughn, page 26, lines 3 and 4.

<sup>2</sup> *Id.* at page 23, lines 5 and 6.

<sup>3</sup> *Id.*

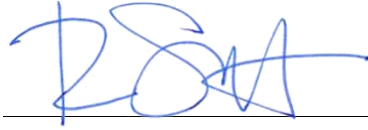
This is especially important to KYSEIA, as the Commission has recognized that the existing interconnection guidelines for distributed generation established in Case No. 2008-001698 must be updated, but has yet to do so.<sup>4</sup> KYSEIA is the primary entity representing solar companies and customer generators on issues related to interconnection and therefore has special and distinct interests that will not otherwise be adequately represented by any other party in this proceeding.

7. The interests of Kentucky Power's net metering customers, applicants for net metering service under Tariff N.M.S, and applicants under the proposed Tariff N.M.S. II are separate and distinct from the interests of other customers of Kentucky Power. The special interests of Kentucky Power's net metering customers will not otherwise be adequately represented by any other party to this proceeding.
8. KYSEIA's motion to intervene is filed prior to the Commission's acceptance of Kentucky Power's application for filing and prior to the issuance of a procedural schedule. KYSEIA's motion is timely.

WHEREFORE, KYSEIA respectfully requests the Commission to grant KYSEIA intervention into the instant case with full rights of a party to the proceeding.

<sup>4</sup> Case No. 2019-00256, *Electronic Consideration of the Implementation of the Net Metering Act* (Ky PSC Dec. 18, 2019), Order at p. 34. KYSEIA participated and submitted substantial comments in that case, as noted by the Order. *See id.* at 19-23, 34.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'R. Strobo', written over a horizontal line.

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**NOTICE AND CERTIFICATION FOR FILING**

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission’s E-Filing System on this 10th day of July, 2020, and further certifies that the electronic version of the paper is a true and accurate copy of each paper filed in paper medium. Pursuant to the Commission’s March 16, 2020, and March 24, 2020, Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus Covid-19*, the paper, in paper medium, will be filed at the Commission’s offices within 30 days of the lifting of the state of emergency.



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Randal A. Strobo

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that it has transmitted on this 10th day of July, 2020, via electronic mail messages, this Motion to Intervene and the accompanying Read1st file for the electronic filing to the parties of record at the electronic mail addresses listed below. The Commission has not excused any party from electronic filing procedures for this case.

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