

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the matter of:

ELECTRONIC INVESTIGATION OF	)	
INTERCONNECTION AND NET	)	Case No. 2020-000302
METERING GUIDELINES	)	

**SUPPLEMENTAL RESPONSE BRIEF OF JOINT INTERVENORS  
EARTH TOOLS AND MOUNTAIN ASSOCIATION**

Come Joint Intervenors, Mountain Association and Earth Tools, Inc., (“MA/ETI”), in the above-styled matter, pursuant to the Commission’s Orders dated February 4, 2026 and March 12, 2026, and provide the following Supplemental Response Brief.

MA/ETI reiterate that they “encourage the Commission to approach the consideration and resolution of the issues that have been identified by the parties both in the 2021 briefing and 2026 supplemental briefing, in the same collaborative manner as the 2008 guideline development process rather than through the typical adversarial process.” A number of issues have been raised in the briefing by various parties, including MA/ETI, in their April 04, 2026 supplemental briefs. Many of those issues and parties are already in accord, others may be in tension and may need further discussion. The collaborative process has worked well to this point on the issues of interconnection, and MA/ETI welcome additional collaboration, whether through informal conference or outside of specific scheduling from the Commission. In particular, MA/ETI note that incorporation of any updated third-party standards, or changes to (or additions) of definitions require a considered approach to ensure that the dual purposes

of the interconnection guidelines to “mitigate possible unsafe conditions”<sup>1</sup> and “to increase the number of net metering customers”<sup>2</sup> are met.

Wherefore, MA/ETI request that a revised procedural schedule be set, allowing for parties to meet and attempt to develop a consensus proposal for consideration by the Commission on changes to the current interconnection guidelines.

Respectfully Submitted,



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#### CERTIFICATE OF SERVICE

In accordance with the Commission’s July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on April 20, 2026; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



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Byron L. Gary

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<sup>1</sup> Ky. PSC, *Order at 7*, Case No. 2023-00309, Electronic Petition of Kenergy Corp. for A Declaratory Order, (Aug. 06, 2024).

<sup>2</sup> Ky. PSC, *Order at 1*, Case No. 2008-00169, Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity Up to Thirty Kilowatts (Jan. 08, 2009).