

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

In the matter of:

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

**JOINT INTERVENORS MOUNTAIN ASSOCIATION AND EARTH  
TOOLS, INC., LIST OF ISSUES TO BE DISCUSSED AT THE  
INFORMAL CONFERENCE SCHEDULED FOR AUGUST 11, 2026**

Come now Joint Intervenor Earth Tools, Inc., and Mountain Association,  
pursuant to the Commission's Order of June 30, 2026, and respectfully offer the  
following short list of issues to be discussed at the informal conference:

1. **Collaborative stakeholder working group.** What does a structured process, potentially staff-facilitated, where utilities, solar/DER industry, and intervenors negotiate redline tariff language with a goal of achieving consensus before it comes back to the Commission for approval, similar to how the 2008 guidelines were developed, look like?
2. **Address scope up front.** Clarify whether the working group and periodic process discussed below will cover net metering/interconnection guidelines only, or also sweep in adjacent issues raised in this docket (BTM storage, third-party DER aggregation, FERC Order 2222 compliance) — and if the latter, how those threads get folded in to the recurring process without derailing a leaner "guideline maintenance" track. Are they handled in a second phase of work for the workgroup?

3. **Concrete procedural schedule** — Commission direction on next steps: working group formation, target dates for a consensus (or competing) proposal, and a briefing/comment schedule on issues for which consensus isn't reached.
4. **Periodic review mechanism.** The current guidelines (from Case No. 2008-00169) have gone 15+ years with only ad hoc, case-by-case tariff changes. Should the Commission establish a defined cadence (e.g., every 3–5 years, or triggered by material IEEE/NEC standard updates or significant integration technology advancements) for revisiting the guidelines, rather than relying on individual investigations?
5. **Mechanism for keeping pace with IEEE 1547 and related standards.** Should any new process include an explicit trigger for revisiting the guidelines whenever the applicable IEEE standard (or NEC, UL 1741, etc.) is updated, so the guidelines don't lag a full revision cycle?
6. **Defined role for non-utility stakeholders in the ongoing process** — formal notice/comment opportunities, or a seat in any working group, for solar installers, advocates, intervenors, and the public, not just utility-Staff engagement.
7. **Mechanism for data-driven elements (interconnection cost data, customer counts, capacity-to-peak-load ratios collected in this DR round) to be refreshed on a recurring basis** as part of the new process, so future reviews aren't starting from scratch on basic factual predicates.

[SIGNATURE & CERTIFICATE ON FOLLOWING PAGES]

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 July 21, 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