

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

In the Matter of

ELECTRONIC APPLICATION OF	)	
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR AN ADJUSTMENT	)	
OF ITS ELECTRIC AND GAS	)	CASE NO. 2025-00114
RATES AND APPROVAL OF	)	
CERTAIN REGULATORY AND	)	
ACCOUNTING TREATMENTS	)	

**RESPONSES OF JOINT INTERVENORS EARTH TOOLS,
INC. AND MOUNTAIN ASSOCIATION TO COMMISSION
STAFF'S FIRST REQUEST FOR INFORMATION**

Dated: October 23, 2025

**JOINT INTERVENORS EARTH TOOLS, INC. AND
MOUNTAIN ASSOCIATION RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION**

Dated October 08, 2026

Case No. 2020-00302

Question No. 1.1

Q-1.1 Refer to Joint Intervenor's Brief at 5.2 Assuming the Commission uses the current net-metering guidelines as a starting point, explain what Joint Intervenor's 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.

A-1.1 The Joint Intervenor's agree with KYSEIA that Kentucky should adopt IREC's 2023 Model Interconnections Procedures, with some modifications suggested below by Joint Intervenor's. The following list highlights which elements of the 2023 Model Procedures we view to be the most important updates needed for Kentucky's Interconnection Standards:

- Incorporate energy storage systems into the interconnection standards and application process. (p. 1 - 2)
- Address non-export or limited-export projects as they are proposed to be operated and based on export characteristics , rather than basing evaluations on nameplate capacity alone. (p. 2, 39 - 42)
- Adopt IEEE Standard 1547-2018 through a separate and transparent stakeholder process. (p. 4-5, 38 - 42)
- Modify categories and names of application types from the current Level 1 and Level 2 to three tracks as recommended in the Model Procedures (see p.2 and further pages as cited below):

- Simplified Process – equivalent to Kentucky’s current Level 1 Interconnection Application. (p.15 - 19). The Joint Intervenors recommend making the Simplified Process available for inverter-based DERs with a nameplate rated capacity of 45 KW or less, consistent with KRS 278.465(2)(c), rather than the 50 KW nameplate rating and 25 KW export capacity rating in the Model. The Model recommends an application fee of \$100 for Simplified Process applications. JI recommend staying in line with Kentucky’s current practice for Level 1 applications and requiring no fee for Simplified Process applications.
- Fast Track – for mid-range projects (with Nameplate Rating up to 5 megawatts (MW)) that would presently fall under Level 2 but require a lesser degree of study for approval. (p.20 – 27)
- Detailed Study – for larger projects that would presently fall under Level 2 but require more extensive study due to their potential grid impacts. (p.32 – 37)¹
- Providing an opportunity for an Applicant Options meeting for projects that fail to be approved under the Simplified Process, Fast Track, or Supplemental Review process, prior to proceeding to a Detailed Study. (p. 31 – 32)
- Establishing clear timelines for all parties (applicant and utility) at each stage of the application and review process, to promote timely reviews and accountability. (See timelines recommended within each of the review track sections listed above (Simplified Process, Fast Track, Supplemental Review, Detailed Study) and p. 42).
- Requiring the use of “100% of minimum load” in place of “15% of peak load” in Fast Track and Supplemental Reviews. (p. 2, 20, 27-28)

¹ Note, for Fast Track and Detailed Study applications the Model recommends an application fee of \$100 plus \$10 per kW of nameplate rating up to a maximum of \$2,000, as well as charges for actual time spent on any interconnection study. The Joint Intervenors recommend that, in line with current practice for Level 2 applications under Kentucky’s Interconnection Guidelines, that the fee for these applications should be \$100 and no more than \$1,000 for any additional studies.

- Establishing a dispute resolution process to attempt to resolve differences between retail electric suppliers and eligible customer-generators to reduce the necessity of formal complaint to the Commission. (p. 43 - 45)
- Providing applicants the opportunity to request a pre-Application Report, for a reasonable fee, to obtain basic information about their proposed point of interconnections prior to submitting a full application. (p. 12-15) The Model recommends a \$300 fee; Joint Intervenors recommend a \$100 fee to be consistent with the other Interconnection application fees.
- Establishing standard utility reporting requirements regarding interconnections and the interconnection queue. (p. 45)
- Enabling Interconnection Applications to be submitted via email or through the Utility's website, in an easy to locate location, and allowing electronic signatures.
- General usability updates to make the Procedures more user friendly, such as providing names for screens for easier referencing. (p. 3)
- Update Application Templates to incorporate recommendations of 2023 Model Appendices.