

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF	)	CASE NO.
INTERCONNECTION AND NET METERING	)	2020-00302
GUIDELINES	)	

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
RESPONSE TO COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION**

Comes now the Kentucky Solar Industries Association, Inc. ("KYSEIA"), by and through counsel, and, in response to the Commission Staff's Second Request for Information filed into the record on October 8, 2026, tenders its response.

WHEREFORE, KYSEIA tenders its Response.

Respectfully submitted,

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On Behalf of KYSEIA

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 23rd day of October 2026. Pursuant to the Commission's July 22, 2021 Order in Case 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard
David E. Spenard

NOTICE REGARDING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David E. Spenard
David E. Spenard

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CASE NO.
2020-00302

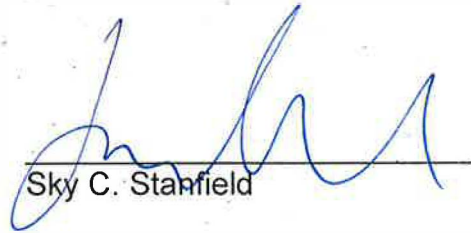
AFFIDAVIT OF SKY C. STANFIELD
VERIFICATION

JURISDICTION

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County of San Francisco

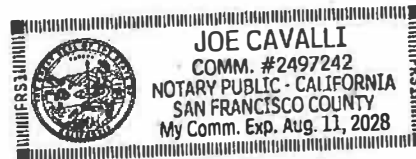
The undersigned, Sky C. Stanfield, being first duly sworn, states the following: The prepared responses to the data requests of Commission Staff constitute the testimony of Affiant in the above-styled case. Affiant states that she would give the answers set forth in the response if asked the questions propounded therein. Affiant further states that, to the best of her knowledge, her statements made are true and correct. Further, Affiant saith not.


Sky C. Stanfield

SUBSCRIBED AND SWORN to before me this 22 day of October, 2026.

2099400.1





Response to Commission Staff's Second Request for Information Case No. 2020-00302

1. Refer to KYSEIA's Supplemental Brief at 4.¹ Assuming the Commission uses the current net-metering guidelines as a starting point, explain what KYSEIA views 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.

Response by Sky C. Stanfield

Attached to this response as Attachment 1 is a table that identifies by topic the criteria of the IREC Freeing the Grid report² where Kentucky did not receive full credit, the corresponding sections of the IREC 2023 Model Procedures ("Model Procedures")³ that model the best practice for that topic, the corresponding sections (if any) of the Interconnection and Net Metering Guidelines – Kentucky ("Kentucky Guidelines"),⁴ and finally a comparison between what the Kentucky Guidelines do relative to the Model Procedures. This table can be used to identify each Model Procedure section that the Commission could use to update its current net metering guidelines.

The following narrative response highlights and provides further explanation of the amendments to the Kentucky Guidelines identified in Attachment 1 that KYSEIA views as priorities.

Clearly defined procedures for all state-jurisdictional projects

As a starting point, the Commission should amend the Kentucky Guidelines in the following three ways to ensure all state-jurisdictional distributed generation projects can interconnect via clearly defined review pathways.

First, the Kentucky Guidelines should apply to all Distributed Energy Resources ("DERs")⁵ subject to the Commission's jurisdiction. Any narrower scope leaves omitted projects without a clear path to interconnection. The Model Procedures apply to all state-jurisdictional interconnections of DERs, with no size or technology limit and

¹ KYSEIA Supplemental Brief (filed Apr. 6, 2026).

² KYSEIA previously provided the 2026 Kentucky Freeing the Grid Score Sheet in its response to the Commission's first information request. See KYSEIA Response to Commission Staff's First Request for Information, Question 1, Attachment 1 (filed Jul. 21, 2026).

³ Interstate Renewable Energy Council, Model Interconnection Procedures, 2023 Edition (Aug. 2023) ["IREC 2023 Model Procedures"].

⁴ KY Pub. Serv. Comm., Admin. Case No. 2008-00169, App. A, Interconnection and Net Metering Guidelines – Kentucky at 1 (Jan. 8, 2009) ["Kentucky Guidelines"].

⁵ The term Distributed Energy Resources, or DERs, refers to resources located on the distribution system (in front of or behind the customer meter) and includes both generation and storage devices. IREC 2023 Model Procedures at 1 (Introduction) and §I.B.12 ("Distributed Energy Resource" or "DER" means the equipment used by an Interconnection Customer to generate, store, manage, interconnect, and monitor electricity. DER includes an Interconnection Equipment Package.).

regardless of the procurement vehicle.⁶ By contrast, the Kentucky Guidelines currently only apply net metering projects with up to 30 kilowatts rated capacity. The guidelines make net metering available by right only to solar, wind, biomass, biogas, or hydro; other projects can be considered for Net Metering only on a case-by-case basis.⁷ This creates uncertainty for non-net metering projects like Public Utility Regulatory Policies Act of 1978 (“PURPA”) Qualifying Facilities, as well as larger customer generators. It also leaves the path for energy storage interconnection undefined. The Commission should expand the Kentucky Guidelines to apply to all interconnections of state-jurisdictional DERs. Merchant plant interconnections are a separate matter outside of this discussion. Projects should not be required to be eligible for net metering in order to have a clear and defined path to interconnection.

Second, the Kentucky Guidelines should define efficient and predictable tiered review processes for all projects.⁸ As is done in nearly all US states, the Kentucky Guidelines should include both defined screening and study processes. They should ensure that every step in the interconnection application, review, and approval process has a clearly defined time limit and owner (utility or project applicant). The Model Procedures create three review paths—Simplified Process, Fast Track, and Detailed Study—that provide the appropriate level of review for each project. The Model Procedures employ detailed screening criteria, including supplemental screens, to quickly determine whether a project is eligible for streamlined review or requires a full study.⁹ Each review lane incorporates step-by-step deadlines that ensure the project applicant and the utility do not cause undue delay and that projects are treated consistently.¹⁰

By contrast, the Kentucky Guidelines create a limited review process, named Level 1,¹¹ that only applies to certified inverter-based projects that meet out-of-date screens.¹² Apart from utility discretion to include other projects in Level 1 review on a case-by-case basis, all other projects fall under Level 2 review, which does not employ screens and has no supplemental review option, nor does it define a study process.¹³ As a result, projects that could be safely approved through streamlined review may

⁶ Attachment 1, row 2; IREC 2023 Model Procedures § I.A. Projects connecting to the transmission system are not state jurisdictional, projects selling into the wholesale market (except for small DER aggregations) are not state jurisdictional, and projects connecting to the distribution system that are engaging in a wholesale transaction with an entity that does not own the distribution line will also be under FERC, not state, jurisdiction.

⁷ Attachment 1, row 2; Kentucky Guidelines at 1 (Jan. 8, 2009).

⁸ KYSEIA advocated for similar amendments (under the 2019 IREC Model Procedures) in its 2021 written brief. KYSEIA Written Brief at 25 (filed Apr. 19, 2021).

⁹ Attachment 1, rows 3-4; IREC 2023 Model Procedures §§ III.A, III.B, III.C, III.E.

¹⁰ Attachment 1, rows 11-14, 16, 33-35; IREC 2023 Model Procedures §§ III.A.4, III.A.6, III.A.9-10, III.B.4, III.B.6, III.B.9-10, III.C.2, III.E.4-8.

¹¹ Note that the IREC Model Procedures transitioned from utilizing review tiers named Levels 1, 2, 3, and 4 in 2023. Regardless of the naming convention, KYSEIA's position remains in support of the Model Procedures' clearly defined, tiered review processes. See KYSEIA Written Brief at 26-29 (discussing 2019 tiers).

¹² Kentucky Guidelines at 3-4.

¹³ Attachment 1, row 4, 12; Kentucky Guidelines at 5-6.

instead undergo a full impact study without a predictable end date.¹⁴ The Commission should follow the Model Procedures and adopt tiered processes to streamline review for projects that do not need study, and they should clearly define the study process for projects that need it. The review processes and timelines outlined in the Model Procedures mirror those widely used across the United States by utilities large and small.

Third, as KYSEIA explained in its 2021 written brief in this proceeding, net metering policies should be separate from interconnection procedures.¹⁵ Interconnection procedures are the “rules of the road” for DERs to safely and reliably connect to the grid.¹⁶ Interconnection procedures should apply to net metering projects as well as PURPA Qualifying Facilities and other distributed resources that a utility procures outside the net metering context. Net metering rules are financial compensation mechanisms for customers; they are logically separate from interconnection procedures. Keeping interconnection and net metering rules separate enables interconnection rules to apply agnostically to net metering and non-net metering projects and avoids the need to change the interconnection rules when there are changes to net metering or other procurement programs. Consistent with this reasoning, the Model Procedures do not set net metering policy.¹⁷ By contrast, the Kentucky Guidelines attempt to address net metering and interconnection in one set of rules, through one application process.¹⁸ The Commission should adopt the Model Procedures’ approach and separate these two distinct policy frameworks, or at the very least provide a clear interconnection pathway for non-net metering resources.

Inclusion of energy storage systems

Energy storage systems increase grid reliability by enabling export control, which gives DERs the ability to ramp up export during periods of peak demand or low generation and limit export during periods of low demand or excess generation.¹⁹ A growing number of states have updated their interconnection rules to include energy storage systems and enable their efficient integration onto the grid.²⁰ The Commission should amend the Kentucky Guidelines to address this increasingly common category of DERs by defining energy storage systems and incorporating them as interconnection-eligible projects subject to appropriate review criteria.²¹

¹⁴ Attachment 1, rows 11-14, 16, 33-35; Kentucky Guidelines at 5-6.

¹⁵ KYSEIA Written Brief at 17-18.

¹⁶ See KYSEIA Response to Commission Staff’s First Request for Information, Question 5, Attachment 1 at 31 (Building a Technically Reliable Interconnection Evolution for Storage (“BATRIES”), Toolkit & Guidance for the Interconnection of Energy Storage & Solar-Plus-Storage (Mar. 2022)) [“BATRIES Toolkit”].

¹⁷ See IREC 2023 Model Procedures, Attachment 3 at 2 (treating net metering, load response, and wholesale provider projects as interchangeable interconnection types within a single application form).

¹⁸ Kentucky Guidelines at 2.

¹⁹ See BATRIES Toolkit at 36-37.

²⁰ See BATRIES Toolkit at 30-31 (listing states as of December 2021).

²¹ Kentucky law omits storage systems from the definition of an “eligible electric generating facility” for purposes of net metering. KRS 278.465(2)(b). However, if the Commission follows KYSEIA’s

The Model Procedures expressly allow interconnection of energy storage systems and include such systems within their definition of DERs.²² Meanwhile, the Kentucky Guidelines limit eligible projects to solar, wind, biomass, biogas, and hydro generation projects. They do not expressly include storage systems.²³ They fail to define “DER” or “energy storage device,” leaving it at best ambiguous whether energy storage systems can interconnect. The Kentucky Guidelines should adopt the Model Procedures’ definitions of these terms and expressly include storage systems.

The Model Procedures also employ numerous provisions to appropriately account for the export control capabilities of energy storage systems. They distinguish between nameplate capacity and export control and identify acceptable methods of export control.²⁴ They determine eligibility for expedited review based on export capacity rather than nameplate capacity²⁵ and assess aggregated generation impacts based on export capacity.²⁶ And they employ an inadvertent export²⁷ screen to avoid impacts from the small amounts of power that may be exported when power control systems activate.²⁸ The Kentucky Guidelines do not address export capacity at all. They use the undefined term “rated capacity” without distinguishing nameplate from export capacity.²⁹ They contain no provisions on export controls, no expedited review based on export capacity, and no screens for aggregated generation that account for export limits.³⁰ To incorporate energy storage system interconnections, the Commission should adopt the provisions in the Model Procedures cited in Attachment 1 that address export capacity.

Screening projects to avoid unnecessarily lengthy application reviews

Thorough, layered screening measures enable interconnection applications to receive the appropriate level of review. KYSEIA recommends the Commission adopt the Model Procedures’ approach to screening by (1) replacing the Kentucky Guidelines’ existing screens with the more comprehensive, current, and effective Model Procedures screens, (2) employing a supplemental layer of screens to identify projects that qualify for expedited review but do not pass initial screens, and (3) providing clear guidance on how applicants can modify their projects to meet screens and avoid a detailed review process.

recommendation to separate net metering policy from Kentucky’s interconnection procedures, this definition would not conflict with one that includes energy storage in interconnection.

²² Attachment 1, row 1; IREC 2023 Model Procedures §§ I.A, I.B.12, I.B.15.

²³ Attachment 1, row 1; Kentucky Guidelines at 1, 16.

²⁴ Attachment 1, rows 25-27; IREC 2023 Model Procedures §§ I.B.16, I.B.35, I.B.42, IV.B.3 (including IV.B.3.c.i defining Certified Power Control Systems as acceptable export control method).

²⁵ Attachment 1, row 5; IREC 2023 Model Procedures § III.B.1.

²⁶ Attachment 1, rows 29, 31; IREC 2023 Model Procedures §§ III.A.3.b, III.B.3.a, III.B.3.f.

²⁷ Inadvertent export refers to unscheduled exports of power from a DER, usually due to fluctuations in load-following behavior. See BATTERIES Toolkit at 43.

²⁸ Attachment 1, row 32; IREC 2023 Model Procedures §§ I.B.24 (defining inadvertent export), III.B.3.b.

²⁹ Attachment 1, row 25; Kentucky Guidelines at 1.

³⁰ Attachment 1, rows 5, 26-27, 29, 31-33; Kentucky Guidelines at 1, 3, 5.

The Model Procedures employ numerous initial screens to identify eligible Simplified Process and Fast Track projects. These screens are well vetted and widely used across the United States, they are updated to reflect current understand of how to safely evaluate inverter based resources while still maintaining reasonable safety buffers.³¹ Each screen applies an objective, quantifiable threshold that allows projects to move through the screening process quickly.

When projects do not pass these initial screens, they may still qualify for Simplified Process or Fast Track if they pass Supplemental Review, a set of additional screens that determine whether a project can still be interconnected safely and reliably without a Detailed Study.³² These include, for example, screens that more closely analyze minimum load data to determine remaining capacity, and that consider impacts to voltage regulation and power quality.³³ The Model Procedures also allow project applicants or the utility to identify modifications that improve the proposed project's ability to interconnect without sacrificing grid reliability or safety. If after these modifications are made, the utility determines the screens are met, the project will be allowed to proceed on the applicable streamlined review track.³⁴

The Kentucky Guidelines provide no expedited or screen-based track for generators over 30 kW "rated capacity," as explained above.³⁵ Where the Kentucky Guidelines do apply screens, they are overly restrictive and not reflective of current best practices. For example, the Kentucky Guidelines only allow aggregated capacity up to 15 percent of the relevant line section's peak load (whereas the Model Procedures allow up to 100 percent of minimum load).³⁶ And the Kentucky Guidelines fail to address export capacity through screening, which can result in projects that limit export failing screens unnecessarily.³⁷ The Kentucky Guidelines also lack any supplemental review screens, and where modifications could result in streamlined review, the Kentucky Guidelines require a denied applicant to resubmit their project under Level 2 review rather than allow them to modify their pending application.³⁸ Taken together, these missing provisions can result in interconnection projects undergoing a full study process even in the absence of evidence that they pose grid concerns that warrant such review. The Commission should amend the Kentucky Guidelines to mirror the screening process set forth in the Model Procedures.

Utility review transparency provisions

As KYSEIA's supplemental brief explained, the Kentucky Guidelines currently allow utilities to deny interconnection requests without providing the applicant with

³¹ Attachment 1, rows 3-4, 28-32; IREC 2023 Model Procedures §§ I.C.2.a-b, III.A.3.b-c, III.B.3.a-b, III.B.3.f.

³² Attachment 1, rows 33-35; IREC 2023 Model Procedures § III.C.3.

³³ Attachment 1, rows 33-35; IREC 2023 Model Procedures §§ III.C.3.a-b.

³⁴ Attachment 1, row 7; IREC 2023 Model Procedures §§ I.D.4.a, III.D.

³⁵ See *also* Attachment 1, row 4; Kentucky Guidelines at 1.

³⁶ Attachment 1, row 28; IREC 2023 Model Procedures §§ III.A.3.b, III.B.3.a; Kentucky Guidelines at 3.

³⁷ Attachment 1, rows 29-32; Kentucky Guidelines at 3.

³⁸ Attachment 1, row 7; Kentucky Guidelines at 4-5.

documentation that demonstrates the grid data, reasoning, and calculations the utility relied on to reach its decision.³⁹ KYSEIA maintains its request that the Commission require utilities to show their work regarding a determination that there is inadequate capacity for a proposed DER.⁴⁰

The Model Procedures contain two kinds of review transparency requirements that the Kentucky Guidelines should adopt. First, the Model Procedures require utilities to provide denied applicants with detailed information about why their project failed review.⁴¹ These provisions apply to all levels of review. Second, the Model Procedures allow prospective applicants to request (for a fee) a Pre-Application Report that specifies the utility's system information relevant to the proposed point of interconnection.⁴² This saves utilities and applicants time and money by allowing applicants to determine their likely eligibility and modify projects before submitting. The Kentucky Guidelines allow applicants to ask the utility questions in advance, but do not guarantee thorough responses.⁴³ And while the Kentucky Guidelines require a utility to supply its reasons for project denial and document their impact study costs, they do not specify that sufficient information must be provided to fully inform an applicant why their project was denied.⁴⁴

Dispute resolution

Even with objective screening criteria, application review timelines, and review and denial transparency requirements, interconnection procedures must provide fair and efficient dispute resolution standards to incentivize adherence to these requirements. The Model Procedures contain provisions for a deadline-driven dispute resolution process with clearly defined steps including written notice, information exchange, meet-and-confer, mediation, and (barring earlier resolution) Commission complaint.⁴⁵ They provide a recurring interconnection forum wherein stakeholders discuss interconnection challenges and potential solutions.⁴⁶ The Model Procedures also provide for an Interconnection Ombudsperson, who can be a staff member appointed by the Commission, to mediate as well as assist with application extension requests and dispute resolution procedures.⁴⁷

The Kentucky Guidelines lack any guidance on a dispute resolution process.⁴⁸ As KYSEIA has explained, current processes allow utilities to provide inadequate

³⁹ KYSEIA Supplemental Brief at 8 (discussing "Unvalidated Infrastructure Capacities"); Kentucky Guidelines at 2, 4-6.

⁴⁰ KYSEIA Supplemental Brief at 8.

⁴¹ Attachment 1, rows 36-37; IREC 2023 Model Procedures §§ III.A.5, III.B.5, III.C.2, III.E.4.c, e.

⁴² Attachment 1, row 41; IREC 2023 Model Procedures §§ I.C.1, II.A.1.h, II.B.

⁴³ Attachment 1, row 41; Kentucky Guidelines at 2 (customers may contact the utility).

⁴⁴ Attachment 1, rows 36-37; Kentucky Guidelines at 4-6.

⁴⁵ Attachment 1, row 43; IREC 2023 Model Procedures § IV.E.

⁴⁶ Attachment 1, row 44; IREC 2023 Model Procedures § IV.G.

⁴⁷ Attachment 1, row 45; IREC 2023 Model Procedures §§ IV.C.2, IV.E.2-5.

⁴⁸ Attachment 1, row 43; see KYSEIA Written Brief at 18 ("Currently, the only dispute resolution process available to an applicant is the informal and formal complaint process through the Commission.").

information about a project denial to an applicant and then apply to the Commission for a declaration of rights relevant to the denial.⁴⁹ This process is fundamentally unworkable for most disputes as it would take substantial cost and time to obtain any resolution from the Commission. The Commission should amend the Guidelines to create a fair dispute resolution process like the one in the Model Procedures.

Cost clarity, certainty, and consistency

The Model Procedures set several limits on how much utilities can charge project applicants to review their DER proposals and perform grid upgrades. These limits make the interconnection process more predictable, clarify costs, and dissuade utilities from overcharging. The Model Procedures cap fees for Fast Track review (which applies to projects up to 5 MW) at \$2,000 and cap fees for Detailed Study at the same baseline level, plus actual costs for study time.⁵⁰ Supplemental Review fees are set at \$2,500.⁵¹ When significant grid upgrades are required, the Model Procedures require the utility to provide a detailed list of necessary upgrades and an itemized cost estimate. The customer must pay for upgrades actually installed, but only up to 25 percent above the utility's cost estimate.⁵² This cost envelope avoids jarring cost surprises and allows better-informed decision making before construction begins.

The Kentucky Guidelines do set some cost limits. For example, they cap Level 2 review fees at \$100 and initial impact study costs at \$1,000.⁵³ However, even these cost limits will need amendment to align with the Model Procedures if the Commission expands the scope of eligible DERs to include projects above the current 30 kW limit. The Kentucky Guidelines should include cost limitations like those in the Model Procedures corresponding to each level of review they adopt (e.g., if the Commission adopts supplemental review it should limit those costs to \$2,500⁵⁴). Additionally, the Kentucky Guidelines should provide the same level of cost predictability regarding grid upgrades as the Model Procedures do. The Kentucky Guidelines require the utility to meet with applicants about estimated costs for upgrades, but they do not require an itemized cost estimate and they place the full cost of upgrades on the applicant, regardless of whether the utility vastly exceeds their estimate.⁵⁵ The Kentucky Guidelines should adopt a cost envelope similar to the 25 percent one in the Model Procedures.

Additionally, as KYSEIA has emphasized in this proceeding, interconnection application review and grid upgrade costs are often inconsistent across utilities. KYSEIA members commonly experience inter-utility application review cost inconsistencies, arbitrary and inconsistent assignment of upgrade costs, and unpredictable construction

⁴⁹ KYSEIA Supplemental Brief at 8-9.

⁵⁰ Attachment 1, row 18; IREC 2023 Model Procedures §§ III.B.2, III.E.2.

⁵¹ Attachment 1, row 19; IREC 2023 Model Procedures § III.C.1.

⁵² Attachment 1, row 20; IREC 2023 Model Procedures §§ III.E.5.d, III.E.6.a.

⁵³ Attachment 1, row 18; Kentucky Guidelines at 6.

⁵⁴ Attachment 1, row 19; IREC 2023 Model Procedures § III.C.1.

⁵⁵ Attachment 1, row 20; Kentucky Guidelines at 5, 7.

costs following engineering studies.⁵⁶ The cost envelope, cost caps, and other recommendations detailed in this response will be effective at reducing many of these inconsistency issues. As a further remedy, KYSEIA continues to recommend that the Commission require utilities to publish cost tables that show the prices of typical units of equipment.⁵⁷ Other states have adopted similar requirements. For example, New York and California require utilities to annually file a unit cost guide (referred to in New York as a cost matrix) that shows the typical cost of upgrade equipment commonly triggered by interconnection projects.⁵⁸ A cost table would enable DER applicants to assess the likely cost of their projects ahead of time. It would also promote consistency among utilities in the kinds of equipment and related costs they require.

Providing a pathway for customers to build grid upgrades

Allowing third-party grid construction would further complement the interconnection cost certainty and timeline efficiency improvements that the above-described recommendations would achieve. Currently, there is no program in Kentucky to allow third-party construction of grid upgrades for interconnection projects. The Model Procedures do not yet address third-party construction. However, utilities in other states encourage this practice pursuant to state commission orders. For example, New York utility National Grid has adopted a public service commission-approved program to facilitate the interconnection of DERs. It includes a “Self-Performance of Distribution Upgrades” program that allows DER applicants to engineer, procure, and construct DER-related upgrades themselves.⁵⁹ In California, Electric Tariff Rule 21 of the state’s three largest utilities, which governs interconnection of DERs, allows for and encourages third-party construction of upgrades to support timely and cost-effective interconnection.⁶⁰ These programs require third-party construction to be performed by utility-approved contractors and satisfy applicable utility grid standards.⁶¹ The

⁵⁶ See KYSEIA Written Brief at 17, 21-23, 32 (noting KYSEIA member complaints of inter-utility inconsistencies, asymmetry of interconnection cost information, and inconsistent cost assignments); KYSEIA Response to Commission Staff’s First Request for Information, Question 4 at 1-3 (explaining various forms of inconsistent interconnection treatment between utilities).

⁵⁷ KYSEIA Written Brief at 21.

⁵⁸ CA Pub. Util. Comm., Dkt. 11-09-011, Decision 16-06-052, at 47 & Attachment A (Jun. 23, 2016) (providing guidance for development of “Unit Cost Guide”); NY Pub. Serv. Comm., Dkts. 24-E-0621 & 24-E-0415, Order on Interconnection Costs and Study Timelines, at 22 (Aug. 17, 2026) (requiring each utility “to publish its cost matrix on its DER interconnection portal by March 31 of each year” and include “equipment and tasks that are common to most interconnections”).

⁵⁹ NY Pub. Serv. Comm., Dkt. 24-E-0322, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Electric Service, National Grid Distributed Generation Self-Performance Program Implementation Plan, at 1 (Mar. 3, 2026), <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7BB091B59C-0000-C927-B807-6EE9AF69C575%7D&DocTitle=Distributed+Generation+Self-Performance+Program+Implementation+Plan>.

⁶⁰ CA Pub. Util. Comm., Dkt. 17-07-007, Order Instituting Rulemaking to Consider Streamlining Interconnection of Distributed Energy Resources and Improvements to Rule 21, Decision 20-09-035, at 2, 102, 216 (Sep. 30, 2020).

⁶¹ NY Pub. Serv. Comm., Dkt. 24-E-0322, National Grid Distributed Generation Self-Performance Program Implementation Plan, at 5; CA Pub. Util. Comm., Dkt. 17-07-007, Decision 20-09-035, at 102-105.

Commission should develop a program that encourages utilities to allow third-party interconnection construction.

Conclusion

In short, the Commission should amend the Kentucky Guidelines to follow the provisions of the Model Procedures identified in Attachment 1 to this response. As explained above, these amendments would provide a more effective and cost-efficient interconnection process that applies to all state-jurisdictional interconnection projects.

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ATTACHMENT 1

Comparison of IREC 2023 Model Interconnection Procedures to Kentucky Interconnection and Net Metering Guidelines

Sources:

“Kentucky Guidelines”: KY Pub. Serv. Comm., Interconnection and Net Metering Guidelines – Kentucky, Case No. 2008-00169, Appendix A (issued by Order of Jan. 8, 2009).

“IREC 2023 Model Procedures”: Interstate Renewable Energy Council, Model Interconnection Procedures, 2023 Edition (Aug. 2023).

“FTG Score Sheet”: Interstate Renewable Energy Council and Vote Solar, 2026 Kentucky Freeing the Grid Score Sheet (last updated July 2026).

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
Category 1: Rule Applicability				
1	Inclusion of energy storage systems	§ I.A: Procedures apply to all state-jurisdictional interconnections of DERs. § I.B.12: “DER” defined as equipment used to generate, store, manage, interconnect, and monitor electricity. § I.B.15: “Energy Storage Device” defined; may be considered a DER or generator for purposes of the procedures.	Appendix A at 1 (Availability): Eligible customer-generator limited to a facility that generates electricity using solar, wind, biomass or biogas, or hydro energy. Energy storage is not listed. Appendix A at 1 (Availability): Utility may, at its sole discretion, provide net metering to customer-generators not meeting all listed conditions on a case-by-case basis. Appendix A at 16 (Level 2 Application form): “Power Source” options limited to solar, wind, hydro, biogas, and biomass. <i>No definition of “generating facility,” “DER,” or energy storage.</i>	Kentucky guidelines limit eligible generators to solar, wind, biomass/biogas, and hydro and do not include energy storage. Model Procedures define DERs to include storage.
2	Generator size limit on interconnections	§ I.A: Procedures apply to all state-jurisdictional interconnections of DERs; no size limit.	Appendix A at 1 (Availability): Eligibility limited by energy source, 30 kW rated capacity, on-premises location, customer ownership and operation, parallel connection, and primary purpose of serving the customer’s own load.	Kentucky guidelines cap eligibility at 30 kW and cover only net metering customers. Model Procedures apply to all state-jurisdictional DER interconnections regardless of size.
Category 2: Streamlined Review				
3	Simplified review process for small projects based on system size, export capacity,	§§ I.C.2.a, III.A: Simplified Process for Certified inverter-based DERs ≤ 50 kW nameplate and ≤ 25 kW export. The utility applies five screens (certification, minimum load, shared secondary, service imbalance,	Appendix A at 3 (Level 1): Level 1 Application used for inverter-based facilities certified by a nationally recognized testing laboratory to UL 1741.	Kentucky guidelines limit the simplified (Level 1) process to systems up to 30 kW, with no distinction between nameplate and export capacity. Model

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
	industry certification status, and other factors.	network) within seven business days. Passing projects needing no utility construction receive an agreement with the results; failing projects may elect Supplemental Review or Detailed Study. § III.A.3.a: Certified Equipment Screen requires an inverter certified to UL 1741 Supplement SB. § I.B.8: “Certified” defined (IEEE 1547/1547.1 testing by an OSHA-recognized NRTL; listing required).	Appendix A at 3–4 (Level 1): Approval if the facility meets eight conditions, including 15% of line-section peak load, shared-secondary and imbalance limits, no area or spot network, and no utility construction. Appendix A at 1 (Availability): 30 kW rated-capacity limit.	Procedures extend simplified review to systems up to 50 kW nameplate with up to 25 kW export.
4	Expedited review process for larger projects based on system size, export capacity, and other factors.	§ I.C.2.b: Fast Track for DERs with a Nameplate Rating up to 5 MW, depending on line capacity and distance from substation. § III.B: Fast Track eligibility is set by export capacity, with higher limits on higher-voltage lines and on higher-capacity lines near a substation. Ten screens check minimum load, inadvertent export, fault current, short-circuit interrupting capability, line configuration, shared-secondary capacity, service imbalance, transient stability, transmission-line connection, and network interconnection. Projects failing screens may elect Supplemental Review or Detailed Study.	Appendix A at 5 (Level 2): Level 2 required for non-inverter-based or Level 1-ineligible facilities; approval if the facility meets the utility’s technical interconnection requirements, based on IEEE 1547. Appendix A at 1 (Availability): 30 kW rated-capacity limit. <i>No expedited or screen-based track for larger generators.</i>	Kentucky guidelines’ only process beyond Level 1, Level 2 review, reaches only systems up to 30 kW and applies no screens. Model Procedures provide Fast Track review for systems up to 5 MW, depending on line voltage, capacity, and distance from substation.
5	Expedited review eligibility based on export capacity	§ III.B.1: Fast Track eligibility based on Export Capacity, with thresholds varying by line voltage and location. § I.B.16: “Export Capacity” defined as Nameplate Rating as limited by export-limiting methods. § I.B.35: “Nameplate Rating” defined as total capacity of all generating or storage units, regardless of export limits.	Appendix A at 1 (Availability): Eligibility based on rated capacity of not greater than 30 kW. Appendix A at 5 (Level 2): Level 2 eligibility depends on inverter type, certification, and Level 1 conditions, not on capacity. <i>No reference to export capacity.</i>	Kentucky guidelines base eligibility on rated capacity and have no expedited process keyed to export capacity. Model Procedures base Fast Track eligibility on export capacity.

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
Category 3: Modifications				
6	Projects requiring only minor or low-cost upgrades avoid full study	§ I.B.34: “Minor System Modifications” defined as utility system work involving little work or low cost (e.g., under eight hours of work or \$8,000 in materials). § III.A.6.b: Simplified Process applications requiring utility construction proceed under Fast Track rather than Detailed Study. § III.B.6.b–c: Projects passing Fast Track or Supplemental Review that need only Interconnection Facilities or Minor System Modifications receive an agreement with an itemized cost estimate; for larger upgrades, the utility may provide an agreement with an estimate or require a Facilities Study.	Appendix A at 4 (Level 1): Level 1 approval requires that no utility construction be needed; otherwise the utility may approve at its discretion or deny, and the customer may resubmit under Level 2. Appendix A at 5 (Level 2): Where utility construction is required, the customer bears the cost; the utility offers to meet on estimated costs and provides an agreement if the customer agrees to pay. Appendix A at 6 (Application, Inspection and Processing Fees): Utility may determine that an impact study is necessary for a Level 2 application.	Kentucky guidelines exclude projects needing any utility construction from Level 1 and do not define minor upgrades or exempt them from study. Model Procedures define Minor System Modifications and allow projects needing them to receive an agreement without Detailed Study.
7	Certain minor project modifications allowed to resolve screening or study issues	§ I.D.4.a: After an application is complete, including after screen or study results, the applicant or utility may identify DER modifications that improve costs, benefits, or the utility’s ability to accommodate the interconnection. § III.D: Applicant Options Meeting to review possible DER modifications after screen failure; the applicant may submit one redesign limited to addressing failed screens or identified upgrades, which the utility evaluates.	Appendix A at 2 (Application and Approval Process): Utility may reject an application for code or safety violations but will work with the customer to resolve those issues to the extent practicable. Appendix A at 4 (Level 1): On denial, the utility supplies reasons; the customer may resubmit under Level 2. Appendix A at 5 (Level 2): On denial, the utility supplies reasons and offers to meet on changes that would result in approval; the customer may resubmit with changes.	Kentucky guidelines allow a denied applicant to resubmit with changes but provide no process for modifying a pending application. Model Procedures provide an Applicant Options Meeting and a one-time redesign to address failed screens without a new application.
8	Material modification defined, with a set review process	§ I.B.33: “Material Modification” defined by impact on later-queued applications or change in Point of Interconnection, with listed exclusions. § I.D.4.b–d: Utility determines whether a proposed modification is material; a material modification requires withdrawal or a new application, while a non-material modification	Appendix A at 8 (Terms and Conditions for Interconnection): No changes to the approved facility without the utility’s prior written permission; capacity increases require a new application; like-kind component replacement is allowed without approval. <i>No definition of material modification.</i>	Kentucky guidelines require utility permission for any change and a new application for capacity increases, without defining material modification. Model Procedures define material modification and set a process for determining whether a change qualifies.

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		retains queue position; disputes go to dispute resolution.		
Category 4: Timelines & Efficiency				
9	Application completeness reviewed within 10 business days	§ I.D.2: Utility acknowledges receipt within 3 business days and determines completeness within 10 business days, listing any missing information.	Appendix A at 4 (Level 1): If an application is incomplete, the utility notifies the customer with a list of additional information needed; the time to respond adds to processing time. Appendix A at 5 (Level 2): Same for Level 2 applications. <i>No deadline for the completeness determination.</i>	Kentucky guidelines require notice of missing information but set no deadline for completeness review. Model Procedures require a completeness determination within 10 business days.
10	Simplified review completed within 10 business days	§ III.A.4: Utility notifies the applicant of Simplified Process screen results within 7 business days after the application is deemed complete.	Appendix A at 4 (Level 1): Utility notifies the customer within 20 business days whether the Level 1 application is approved or denied.	Kentucky guidelines allow 20 business days for Level 1 decisions. Model Procedures require Simplified Process screen results within 7 business days of a complete application.
11	Initial review screens applied within 15 business days	§ III.B.4: Utility notifies the applicant of Fast Track screen results within 15 business days after the application is deemed complete.	Appendix A at 5 (Level 2): Utility processes the Level 2 application within 30 business days of receipt of a complete application.	Kentucky guidelines allow 30 business days to process Level 2 applications. Model Procedures require Fast Track screen results within 15 business days.
12	Supplemental review completed within 20 business days	§ III.C.2: Utility performs Supplemental Review and provides a written report within 20 business days of the applicant's election and payment.	<i>No supplemental review.</i>	Kentucky guidelines provide no supplemental review. Model Procedures require Supplemental Review within 20 business days of the applicant's election.
13	Study process completed within 120 calendar days	§ III.E.4.e: System Impact Study completed within 40 business days of the executed study agreement.	Appendix A at 6 (Application, Inspection and Processing Fees): Utility may require an impact study for a Level 2 application.	Kentucky guidelines set no deadline for completing an impact study. Model

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		§ III.E.5.d: Facilities Study completed within 45 business days of the executed study agreement.	<i>No deadline for completing an impact study.</i>	Procedures require completion of System Impact and Facilities Studies within 40 and 45 business days, respectively.
14	Timeframe specified for utility to provide an interconnection agreement	§ III.A.6.a: Simplified Process agreement provided with screen results when no utility construction is required. § III.B.6: Fast Track agreement provided with screen results when no construction is required, or within set business-day periods when upgrades are required. § III.E.6.a: Agreement provided within 5 business days of completion of the last study.	Appendix A at 4 (Level 1): Within 20 business days, the utility indicates approval by signing and returning the Level 1 Application form. Appendix A at 5 (Level 2): Within 30 business days of a complete application, the utility provides an agreement to sign on approval; where utility construction is required, the agreement follows “within a reasonable time” after the customer agrees to pay.	Kentucky guidelines set agreement deadlines only where no utility construction is required. Model Procedures set deadlines for the agreement at every review level.
15	Interconnection agreement provided with notice of passing screens	§§ III.A.6.a, III.B.6.a: Agreement provided at the same time as Simplified Process, Fast Track, or Supplemental Review results when no utility construction is required.	Appendix A at 4 (Level 1): Approval is indicated by the utility signing and returning the Level 1 Application form. Appendix A at 5 (Level 2): On approval the utility provides an agreement to sign. <i>Level 2 applies no screens.</i>	Kentucky guidelines tie the agreement to approval, but Level 2 applies no screens. Model Procedures require the agreement to accompany screen results when no utility construction is needed.
16	Timeframe specified for permission to operate (“PTO”)	§§ III.A.9, III.B.9: Utility may inspect within 10 business days of notice of the start date and gives written notice of passage, or that no inspection is needed, within 3 business days. § III.E.7.a: Utility inspects within 10 business days and approves operation in writing within 5 business days of completing the inspection. §§ III.A.10, III.B.10, III.E.8: Applicant may begin operation once an agreement is in effect, code official approval is received, and any required inspection is passed or waived.	Appendix A at 4 (Level 1): Customer schedules any required inspection and witness test to occur within 10 business days of installation and may not operate until it is passed. Appendix A at 6 (Level 2): Customer may not operate until the agreement is signed and its conditions are met. <i>No deadline for the utility to grant PTO.</i>	Kentucky guidelines set an inspection scheduling window for Level 1 but no deadline for the utility to grant PTO. Model Procedures require written notice of inspection results or approval to operate within set periods.

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
Category 5: Interconnection Costs & Requirements				
17	Site control requirements identified, with documentation required	§ I.D.5: Documentation of site control must be submitted with the application; ownership, leasehold, option, or exclusivity agreement suffices.	Appendix A at 1 (Availability): Generating facility must be located on the customer's premises and owned and operated by the customer. <i>No site control documentation requirement.</i>	Kentucky guidelines require the facility to be on the customer's premises but require no site control documentation. Model Procedures require site control documentation with the application.
18	Application fees of no more than \$2,000 for certified, inverter-based generators up to 5 MW	§ III.B.2: Fast Track application fee of up to \$100 plus \$10/kW of Nameplate Rating, capped at \$2,000. § III.E.2: Detailed Study application fee subject to the same cap, plus actual study time.	Appendix A at 6 (Application, Inspection and Processing Fees): Level 2 fee of up to \$100; customer pays reasonable initial impact study costs up to \$1,000. Appendix A at 1 (Availability): 30 kW rated-capacity limit.	Kentucky guidelines set fees only for systems up to 30 kW. Model Procedures cap Fast Track application fees at \$2,000 for systems up to 5 MW.
19	Supplemental review cost capped at \$2,500	§ III.C.1: \$2,500 Supplemental Review fee.	<i>No supplemental review.</i>	Kentucky guidelines provide no supplemental review. Model Procedures set a \$2,500 Supplemental Review fee.
20	Upgrade costs capped at estimated amounts (within 10–30%)	§ III.E.5.d: Applicant is not responsible for upgrade costs exceeding the Facilities Study estimate by more than 25%. § III.E.6.a: Agreement's itemized quote is subject to the Facilities Study cost limit.	Appendix A at 5 (Level 2): Customer bears the cost of required utility construction; the utility offers to meet on estimated costs. Appendix A at 7 (Terms and Conditions for Interconnection): Customer pays actual costs of excess facilities prior to construction. <i>No cap on upgrade costs.</i>	Kentucky guidelines make the customer responsible for actual upgrade costs with no cap. Model Procedures cap customer responsibility at 25% above the Facilities Study estimate.
21	Insurance requirements waived for small inverter-based systems	§ IV.H.6.b: No insurance required for inverter-based DERs under 1 MW Nameplate Rating.	Appendix A at 9 (Terms and Conditions for Interconnection): Customer must maintain general liability insurance for Level 1 and Level 2 facilities and provide proof on request.	Kentucky guidelines require general liability insurance for all facilities. Model Procedures require no insurance for inverter-based systems under 1 MW.

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
22	External disconnect switch requirements waived for inverter-based systems up to at least 10 kW	§ IV.H.5: Utility may not require additional controls other than a utility-accessible disconnect switch for non-inverter-based DERs.	Appendix A at 7–8 (Terms and Conditions for Interconnection): Where required by the utility, the customer installs an external disconnect switch; the utility may waive the requirement at its sole discretion on a case-by-case basis.	Kentucky guidelines allow utilities to require an external disconnect switch for any facility, subject only to discretionary waiver. Model Procedures allow a switch requirement only for non-inverter-based DERs.
Category 6: Updated Standards & Export Provisions				
23	Date for IEEE 1547-2018 compliance specified	§ IV.A.1: DERs must comply with IEEE 1547-2018 beginning on a date the Commission specifies.	Appendix A at 4 (Level 1): Level 1 condition requires no identified violations of IEEE 1547 (2003). Appendix A at 5 (Level 2): Utility technical requirements are based on IEEE 1547. <i>No reference to IEEE 1547-2018 or a compliance date.</i>	Kentucky guidelines reference IEEE 1547 without specifying an edition or compliance date. Model Procedures require compliance with IEEE 1547-2018 as of a specified date.
24	Performance categories, voltage regulation function activation, and settings specified	§ IV.A.1.a–b: Assigns abnormal and normal operating performance categories for inverter-based and rotating DERs. §§ IV.A.3–4: Utility posts settings, including reactive power control and voltage-active power functions, in Commission-approved Technical Interconnection and Interoperability Requirements. Attachment 9: Template for Technical Interconnection and Interoperability Requirements.	Appendix A at 5 (Level 2): Utility technical interconnection requirements, based on IEEE 1547, are made available online and on request. <i>No performance categories or function settings.</i>	Kentucky guidelines leave technical requirements to each utility and do not address performance categories or function settings. Model Procedures assign categories and require Commission-approved settings.
25	Nameplate and export capacity defined and distinguished	§ I.B.16: “Export Capacity” defined. § I.B.35: “Nameplate Rating” defined.	Appendix A at 1 (Availability): Eligibility based on undefined “rated capacity.” <i>No definition of nameplate or export capacity.</i>	Kentucky guidelines use the undefined term “rated capacity” and do not distinguish nameplate from export capacity. Model Procedures define both terms.

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26	Acceptable export control methods identified	§ IV.B.3: Lists acceptable methods to limit export for non-exporting and limited-export DERs, including protective relays, relative DER rating, configured power rating, certified Power Control Systems, and agreed-upon means.	<i>No provision on export controls.</i>	Kentucky guidelines do not address export controls. Model Procedures identify acceptable export control methods.
27	Certified Power Control Systems accepted for export control	§ IV.B.3.c.i: Certified Power Control Systems are an acceptable export control method. § I.B.42: “Power Control System” defined.	<i>No provision on power control systems.</i>	Kentucky guidelines do not address power control systems. Model Procedures accept Certified Power Control Systems for export control.
Category 7: Initial Review Screens				
28	Initial review aggregated generation screen set at 90% or more of minimum load	§§ III.A.3.b, III.B.3.a: Aggregate export capacity on the Line Section may not exceed 100% of Relevant Minimum Load. § I.B.48: “Relevant Minimum Load” defined.	Appendix A at 3 (Level 1): Aggregated generation on a radial circuit may not exceed 15% of the Line Section’s annual one-hour peak load.	Kentucky guidelines limit aggregate generation to 15% of line-section peak load. Model Procedures use 100% of line-section minimum load.
29	Initial review aggregated generation screen based on export capacity	§§ III.A.3.b, III.B.3.a: Screen measures the DER’s Export Capacity aggregated with other exporting generation.	Appendix A at 3 (Level 1): Screen measures “aggregated generation,” without reference to export capacity.	Kentucky guidelines measure aggregated generation without reference to export capacity. Model Procedures apply the screen to aggregate export capacity.
30	Transformer screen set at 65% of transformer nameplate rating	§§ III.A.3.c, III.B.3.f: Aggregate capacity on a single-phase shared secondary may not exceed 65% of transformer nameplate rating.	Appendix A at 3 (Level 1): Aggregate generation capacity on a single-phase shared secondary may not exceed the smaller of 20 kVA or the transformer nameplate rating.	Kentucky guidelines cap shared-secondary generation at the smaller of 20 kVA or the transformer nameplate rating. Model Procedures use 65% of transformer nameplate rating.
31	Transformer screen based on export capacity	§ III.B.3.f: Screen measures aggregate Export Capacity on the shared secondary.	Appendix A at 3 (Level 1): Screen measures “aggregate generation capacity,” without reference to export capacity.	Kentucky guidelines measure aggregate generation capacity without reference to export capacity. Model Procedures apply the screen to aggregate export capacity.

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
32	Inadvertent export screen for systems with more than 250 kW of non-exporting capacity	§ III.B.3.b: For DERs whose nameplate exceeds export capacity by more than 250 kW, inadvertent export may not cause more than a 3% voltage change. § I.B.24: “Inadvertent Export” defined.	<i>No inadvertent export screen.</i>	Kentucky guidelines contain no inadvertent export screen. Model Procedures apply one in Fast Track review.
Category 8: Supplemental Review Screens				
33	Supplemental review screens allow expedited process for generators that do not pass initial screens, up to 100% of minimum load	§ III.C.3.a: Aggregate export capacity on the Line Section must be less than 100% of Relevant Minimum Load, or 30% of peak load where minimum load data are unavailable.	<i>No supplemental review.</i>	Kentucky guidelines provide no supplemental review. Model Procedures apply a 100% of minimum load screen in Supplemental Review.
34	Supplemental review screen based on export capacity	§ III.C.3.a: Screen measures the DER’s Export Capacity aggregated with other exporting generation.	<i>No supplemental review.</i>	Kentucky guidelines provide no supplemental review. Model Procedures apply the Supplemental Review screen to aggregate export capacity.
35	Voltage and power quality screen included in supplemental review	§ III.C.3.b: Screen confirms voltage regulation can be maintained and that voltage fluctuation and harmonics meet IEEE 1547 limits, using export capacity for export-limited DERs.	<i>No supplemental review.</i>	Kentucky guidelines provide no supplemental review. Model Procedures include a voltage and power quality screen tied to IEEE 1547.
Category 9: Data Sharing & Reporting				
36	Expedited screen results provided in detailed format	§§ III.A.5, III.B.5: On screen failure, utility identifies in writing the screens failed, the technical reasons, and the specific system threshold or limitation causing failure. § III.C.2: Supplemental Review results include a written report of the analysis and data underlying the determinations.	Appendix A at 4 (Level 1): On denial, utility supplies reasons for denial. Appendix A at 5 (Level 2): On denial, utility supplies reasons for denial and offers to meet.	Kentucky guidelines require only reasons for denial. Model Procedures require identification of failed screens, technical reasons, and the system limitation causing failure.

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
37	Study reports detail the analysis and how conclusions are reached	§ III.E.4.e: System Impact Study includes a description of the utility's analysis, conclusions, and supporting reasoning. § III.E.4.c: Utility tariff describes the elements of a typical System Impact Study.	Appendix A at 6 (Application, Inspection and Processing Fees): Utility documents the actual cost of any impact study. <i>No requirements for study report content.</i>	Kentucky guidelines set no requirements for study report content. Model Procedures require study reports to describe the analysis, conclusions, and reasoning.
38	Upgrade cost estimates itemized	§ III.E.5.d: Facilities Study includes an itemized cost estimate breaking out equipment, labor, operation and maintenance, and other costs, including overheads. § III.B.6.b–c: Fast Track agreements requiring upgrades include an itemized, non-binding good faith cost estimate.	Appendix A at 5 (Level 2): Utility offers to meet to discuss estimated costs and construction timeframe. Appendix A at 5–6 (Level 2): Interconnection agreement contains a description and cost of required utility system changes.	Kentucky guidelines require no itemized cost estimate. Model Procedures require itemized estimates identifying equipment, labor, and other costs.
39	Public interconnection queue updated at least monthly	§ I.D.3: Utility maintains a single public queue on its website, updated at least monthly. Attachment 7: Public queue content requirements.	<i>No public queue.</i>	Kentucky guidelines do not require a public queue. Model Procedures require a public queue updated at least monthly.
40	Public queue enables tracking of each project's process timelines	Attachment 7: Queue entries include dates of completeness, screen and study results, agreement delivery and execution, and PTO.	<i>No public queue.</i>	Kentucky guidelines do not require a public queue. Model Procedures require queue entries that record the date of each major process step.
41	Pre-application report available for no more than \$500	§§ I.C.1, II.A.1.h: Optional Pre-Application Report available for a \$300 non-refundable processing fee. § II.B: Utility provides a report with specified system information about the proposed point of interconnection within 10 business days.	Appendix A at 2 (Application and Approval Process): Customers may contact the utility with questions before submitting an application. <i>No pre-application report.</i>	Kentucky guidelines allow informal questions before applying but provide no pre-application report. Model Procedures provide a pre-application report for a \$300 fee.
42	Public report on interconnection timelines and costs at least annually	§ IV.F: Utility files an interconnection report with the Commission twice a year and posts it publicly.	<i>No reporting requirement.</i>	Kentucky guidelines require no public reporting. Model Procedures require semiannual

No.	Topic	IREC 2023 Model Procedures	Kentucky Guidelines	Comparison
		Attachment 8: Report includes processing times, study costs, upgrade costs, and deviations from estimates.		public reports on processing times and costs.
Category 10: Dispute Resolution				
43	Dispute resolution process available	§ IV.E: Dispute resolution process with written notice, information exchange, meet-and-confer, mediation, and Commission complaint.	<i>No dispute resolution process.</i>	Kentucky guidelines contain no dispute resolution process. Model Procedures set a multi-step dispute resolution process.
44	Regular interconnection forum provided	§ IV.G: Commission hosts a quarterly public interconnection forum.	<i>No interconnection forum.</i>	Kentucky guidelines provide no interconnection forum. Model Procedures call for a quarterly Commission-hosted forum.
45	Ombudsperson or equivalent available to assist with interconnection	§ IV.C.2: Interconnection Ombudsperson decides further timeline extension requests; n.30 notes the Commission may designate the ombudsperson. §§ IV.E.2–5: Interconnection Ombudsperson receives dispute notices, assists with timeline disputes, and may mediate.	<i>No ombudsperson.</i>	Kentucky guidelines provide no ombudsperson. Model Procedures assign an Interconnection Ombudsperson a role in extensions and disputes.