

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.  
MOTION TO INTERVENE**

Come now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, requests 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  
Lexington, Kentucky 40511  
(877) 312-7456  
[matt@solar-energy-solutions.com](mailto: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. Both Mr. Partymiller and KYSEIA, separately, take service under Kentucky Utilities’ net metering tariff.

KYSEIA has special and distinct interests on behalf of its members, including its specific member below, but also as solar association that represents solar companies that must disseminate information and calculate costs and rates of return based upon the various jurisdictional utilities' net metering tariffs and the interconnection of systems.

- b. Solar by Ecos LLC is a member of KYSEIA and takes service under Louisville Gas and Electric's net metering tariff. Solar by Ecos LLC is organized under the laws of the Commonwealth of Kentucky and is in good standing with the Kentucky Secretary of State. Solar by Ecos LLC will participate in this proceeding through Christopher E. Zitelli, member of Solar by Ecos LLC and who also takes service at his residence under Louisville Gas and Electric's net metering tariff.
4. The proceeding is an investigation into interconnection and net metering guidelines. KYSEIA has a special and distinct interest in these interconnection procedures and net metering guidelines, as it not only represents customer generators and potential customer generators who are subject to those procedures and guidelines, it also represents the solar companies that will ultimately be assisting these customers and potential customers in complying with those interconnection procedures and net metering applications.
5. KYSEIA has subject-matter expertise on issues relevant to this proceeding and is the primary entity representing solar companies and customer generators on issues related to interconnection. KYSEIA's intervention is likely to present issues

or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

6. This proceeding 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.<sup>1</sup> The interests of KYSEIA are separate and distinct from the interests of the other parties to the proceeding, and the special interests of KYSEIA will not otherwise be adequately represented by any other party to this proceeding.
7. KYSEIA's motion to intervene is filed prior to the October 31, 2020; therefore, 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.

Respectfully submitted,

/s/ David E. Spenard

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<sup>1</sup> Order (Ky PSC Sep. 24, 2020), p. 1; see also Case No. 2019-00256, *Electronic Consideration of the Implementation of the Net Metering Act* (Ky PSC Dec. 18, 2019), Order at p. 34.

## 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 26<sup>th</sup> day of October, 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.

/s/ David E. Spenard  
David E. Spenard

## CERTIFICATE OF SERVICE

Undersigned counsel certifies that it has transmitted on this 26<sup>th</sup> of October, 2020, via electronic mail messages, this Motion to Intervene and the accompanying Read1st file for the electronic filing to the parties of record who at their electronic mail addresses filed into the record for the case electronic mail message. Further, a paper copy has been served, United States Mail, first class, postage prepaid, to the following parties who are identified on the service list for the September 24, 2020 Order but who have not filed into the record an electronic mail address. The Commission has not yet excused any party from electronic filing procedures for this case.

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