

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF)
INTERCONNECTION AND NET METERING) CASE NO. 2020-0302
GUIDELINES)

**RESPONSE OF JOINT INTERVENTORS MOUNTAIN ASSOCIATION AND EARTH
TOOLS, INC. IN SUPPORT OF MOTIONS OF EAST KENTUCKY POWER
COOPERATIVE, BIG RIVERS ELECTRIC CORPORATION, AND LOUISVILLE GAS
AND ELECTRIC COMPANY / KENTUCKY UTILITIES FOR EXTENSION OF TIME TO
FILE BRIEFS**

Come Joint Intervenor Mountain Association and Earth Tools, Inc. ("Joint Intervenor"), in response to the Motions of East Kentucky Power Cooperative, Louisville Gas and Electric Company / Kentucky Utilities, and Big Rivers Electric Corporation, and for the reasons stated in those Motions, support those requests for an additional thirty (30) days and ask that all parties be accorded a thirty (30) day extension beyond the date set in the Commission's Order of February 26, 2021 to file written briefs setting forth current and reasonably anticipated issues and concerns identified by each party regarding net metering interconnection guidelines and FERC Order No. 2222. The jurisdictional utilities and the Joint Intervenor participated in a consensus-based administrative case to establish the initial Interconnection Guidelines for net-metering customer-generators, and Joint Intervenor concurs that the additional time will be beneficial to

all parties in considering FERC Order 2222 and any needed revisions to the Interconnection Guidelines.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the electronic version of the foregoing is a true and accurate copy of the same document that will be filed in paper medium; that the electronic filing has been transmitted to the Commission on March 2, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that in accordance with the March 16, 2020 Commission Order in Case No. 2020-00085 an original and ten copies in paper medium of this *Response of Joint Intervenors Mountain Association and Earth Tools, Inc. In Support Of Motions of East Kentucky Power Cooperative, Louisville Gas and Electric Company / Kentucky Utilities, and Big Rivers Electric Corporation For Extension of Time To File Briefs* will not be mailed until after the lifting of the current state of emergency.



Tom FitzGerald