

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

In the Matter of:

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

GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION’S
VERIFIED RESPONSE TO
COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION
ENTERED JUNE 30, 2026

Comes now Grayson Rural Electric Cooperative Corporation (“Grayson RECC”), by counsel, and does hereby tender its Verified Response to the Commission Staff’s First Request for Information entered June 30, 2026.

Dated: July 14, 2026

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

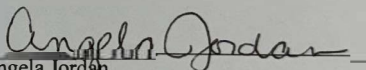
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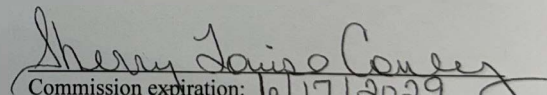
VERIFICATION OF ANGELA JORDAN

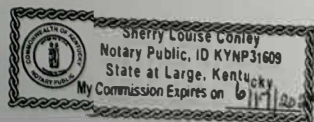
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF CARTER)

Angela Jordan, Senior Member Services Advisor, being duly sworn, states that she has supervised the preparation of responses to Commission Staff's First Request for Information in the above referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.


Angela Jordan

The foregoing Verification was signed, acknowledged and sworn to before me this 13th day of July 2026, by Angela Jordan.


Commission expiration: 6/17/2029



Grayson Rural Electric Cooperative Corporation
Case No. 2020-00302
Commission Staff's First Request for Information

Request 1: Refer to Case No. 2008-00169, Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity up to Thirty Kilowatts (Ky. PSC Jan. 8, 2009), Appendix A.

- a. Provide red-lined tariff sheets for any updates or changes made to the utility's tariff regarding the interconnection and net-metering guidelines since the implementation of such guidelines in Case No. 2008-00169.
- b. Provide any safety or engineering requirements currently required or available to net metering and interconnection customers to help ensure safety and reliability that are not required under the Commission's Interconnection and Net Metering Guidelines.
- c. Provide the current percent of cumulative capacity of the utility's single hour peak load during calendar year 2025. Explain how the utility calculated this percentage.
- d. Provide the case number where each change or update was approved.

Response 1(a): Please see the Commission's website, Records, Proposed Tariff Changes Post-Review for all of Grayson RECC's tariff changes. Grayson RECC's current net metering tariff can be found on the Commission's website, Records, Current Tariffs. Please see Grayson RECC's Tariff, P.S.C. 4, 1st Revised Sheet No. 1, Rate Schedule NM – Net Metering.

Response 1(b): All safety and emerging requirements are contained in the Application for Interconnection. Please see Grayson RECC's Tariff, P.S.C. 4, Original Sheet No. 13, Level 1-Application for Interconnection and Net Metering.

Response 1(c): Grayson RECC's current percentage of cumulative capacity of its single hour peak load for 2025 was 80%. This was calculated by taking Grayson RECC's net metering capacity and dividing by its single hour peak load (which includes its entire load).

Response 1(d): Case No. 2019-00440, *Electronic Amendment of Jurisdictional Electric Utilities' Net Metering Tariffs to Reflect the Increase in Maximum Rated Capacity from 30 Kilowatts to 45*

Kilowatts Pursuant to the Net Metering Act, December 9, 2019 Order (Ky. PSC December 9, 2019).

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Request 2: Describe how many net-metering and interconnection customers the utility has, including what type of generating facility and energy storage, if applicable, each customer has.

Response 2: As of July 14, 2026, Grayson RECC has a total of 56 net-metering and interconnection members. Of those members, 28 use a grid-tied inverter, while the other 28 use a grid-tied microinverter. Ten of the 56 members have energy storage by battery.

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Request 3: Provide a breakdown of the approximate costs for the utility associated with interconnection for the past five years. In this response, separate the approximate costs associated with level 1 and level 2 applications.

Response 3: Grayson RECC does not track the cost for interconnection. However, Grayson RECC has made a high level estimate for purposes of this response. Grayson RECC looked at the costs associated for equipment, overhead and labor for the net metering applications received and the costs would be somewhere between \$200 and \$300 per application. If the applicant then interconnects Grayson would also have lost revenues associated with that interconnection.

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Request 4: Provide an overview of how the interconnection application and agreement process works. In this overview, explain approximately how long each step in the process takes, who is responsible for initiating each step of the process, when progress is communicated to the applicant, and what costs are associated with this process for the utility and applicants. Also explain, if a customer does not qualify or is ineligible during the review process, the protocols and considerations for coming to that determination and communicating that decision to the applicant.

Response 4: Please see Grayson RECC's Tariff, P.S.C. 4, Original Sheet No. 13, Level 1- Application for Interconnection and Net Metering. Also see, Grayson's Tariff, P.S.C. 4, Original Sheet No 23, Level 2- Application for Interconnection and Net Metering. The process for potential net-metering interconnection is outlined in Application for Level 1 and Level 2 interconnections.

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Request 5: Explain whether the utility recovers in rates any expenses for the interconnection application process. If not, explain why not.

Response 5: No, there is no rate recovery. The interconnections are a non-recurring expense and completed in the ordinary course of business. There are no recoverable expenses associated with interconnection.

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Request 6: Explain which IEEE Standard is currently applicable for purposes of interconnection. If IEEE Standard 1547-2018 is not currently applicable, explain the utilities' position for implementing IEEE Standard 1547-2018.

Response 6: In Grayson RECC's net metering application IEEE Standard 1547 is referenced. It is understood that the current version of the standard is applicable.

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Request 7: Explain the interconnection requirements if a customer does not qualify or is ineligible during the review process for a level one application; a level two application; and both levels.

Response 7: If a member does not qualify or is ineligible, the member cannot interconnect.

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Request 8: Explain how behind the meter battery energy storage resources are considered under the existing tariff for both net-metering and non-net metering customers.

Response 8: If they are net-metering members, they are considered as all other non-net-metering members are considered. If a member is a non-net metering member, the Cooperative would have no way to know if the member has battery storage.

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Request 9: Explain what safety and technical standards are used to safely and reliably integrate behind-the-meter battery energy storage resources. Explain, if applicable, what changes to software, communications, billing, and utility systems would need to change in order to accommodate third party DER- aggregation. If not applicable, explain why not.

Response 9: The safety and technical standard are the IEEE 1547 standard current version. The Commission's Order in Case No. 2012-00169¹, requires East Kentucky Power Cooperative, Inc. to act as the aggregator for its Member-Owner Cooperatives, and third-party aggregators are not allowed.

¹ *Application of East Kentucky Power Cooperative, Inc. to Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection LLC*, Case No. 2012-00169, December 21, 2012 Order (Ky. PSC December 21, 2012).