

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

In the Matter of:

ELECTRONIC INVESTIGATION OF	)	
INTERCONNECTION AND NET METERING	)	Case No. 2020-00302
GUIDELINES	)	

**REPLY BRIEF OF KENTUCKY POWER COMPANY**

Kentucky Power Company (“Kentucky Power” or “Company”) provides this reply brief in response to supplemental briefs filed by other stakeholders in this proceeding.

Kentucky Power supports the recommendation from many stakeholders<sup>1</sup> that if the Commission elects to update the Net Metering and Interconnection Guidelines (the “Guidelines”) that such update take place in a collaborative process among the stakeholders and the Commission. Over 17 years have passed since the Guidelines were first published. During those 17 years, each of the parties to this proceeding have developed expertise on issues that in the aggregate could greatly improve the Guidelines. The key issues for comment and discussion should include the scope of the Guidelines, the imposition of application fees reflecting the principles of cost-causation, opportunities to make the application process more efficient while still ensuring system safety, and matters relating to DER aggregation under FERC Order 2222. Accordingly, the Company requests that the Commission amend the procedural schedule to implement a series of informal conferences that would allow stakeholders to provide comments on key issues identified in the supplemental briefs in an orderly fashion.

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<sup>1</sup> See, Kentucky Utilities Company and Louisville Gas and Electric Company’s Supplemental Comments at 1-2; Joint Supplemental Brief of Big Rivers Electric Corporate and Its Members at 2; and Supplemental Brief of Joint Intervenors Earth Tools and Mountain Association at 17.

Two of the stakeholders filing supplemental briefs raised issues relating to the treatment of energy storage facilities under the Guidelines.<sup>2</sup> The Commission recently confirmed that the net metering statute and, in particular that the definition of “eligible electric generation facility” in KRS 278.465(2) does not contemplate energy storage facilities.<sup>3</sup> The Commission cannot through regulation expand the definition of eligible electric generating facilities to include energy storage facilities. Only the Kentucky Legislature can do that. As such, energy storage facilities are not eligible for net metering and should not, absent a statutory change, be included in the Guidelines.

### CONCLUSION

Kentucky Power looks forward to continuing to discuss these topics with the Commission and stakeholders as these proceedings continue.

Respectfully submitted,



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<sup>2</sup> See, Supplemental Brief of Joint Intervenors Earth Tools and Mountain Association at 15-16; and Kentucky Solar Industries Association, Inc. Supplemental Brief at 4-6.

<sup>3</sup> Order, *In the Matter of: Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates and Approval of Certain Regulatory and Accounting Treatments* at 241. Case No. 2025-00113 (Ky. P.S.C. Feb. 16, 2026).