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1. Distribution-level interconnection rules must preserve utility-specific engineering discretion, particularly for rural, radial cooperative systems;

2. Any revisions must avoid cost shifts from individual distributed energy resource (“DER”) projects to non-participating cooperative members; and

3. FERC Order No. 2222 does not require immediate revision of Kentucky’s distribution-level net metering or interconnection framework.²

The responses below are grounded in these principles.

I. THE JOINT INTERVENORS’ SUPPLEMENTAL BRIEF

A. Mandatory and Uniform Interconnection Timelines

The Joint Intervenors urge adoption of rigid, uniform interconnection timelines with limited tolling, asserting that uncertainty discourages customer investment.

Big Rivers and the Members do not oppose clearly articulated review timelines tied to complete applications. They do, however, oppose inflexible, automatic deadlines divorced from distribution system conditions. Cooperative systems often consist of long, radial feeders with limited fault tolerance. Project-specific engineering review—including requests for additional data or design modification—is essential to ensure safe interconnection and to avoid post-installation remedial costs borne by the membership as a whole.

² See also, Kentucky Utilities Company and Louisville Gas and Electric Company, Supplemental Comments at 1 (Apr. 6, 2026).

1 The Commission should retain the existing framework, which conditions
2 timelines on receipt of complete and conforming applications, rather than adopt
3 deemed-approval mechanisms ill-suited to rural cooperative systems.

4 B. Characterization of Engineering Review as a “Barrier”

5 The Joint Intervenors characterize utility discretion as an unjustified
6 “barrier” to DER deployment. Big Rivers and the Members respectfully reject this
7 premise. Engineering review and conditional approvals are not barriers; they are
8 fundamental elements of safe and reliable electric service and reflect utilities’
9 statutory obligations to protect the public and their member-owners. Casting
10 prudent engineering practices as regulatory obstacles risks shifting safety and
11 reliability risks from individual DER projects to non-participating cooperative
12 members. The Commission should decline regulatory revisions premised on this
13 assumption.

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15 II. KYSEIA’S SUPPLEMENTAL BRIEF

16 A. Broad and Anticipatory Reforms

17 KYSEIA advocates broad and anticipatory reforms to Kentucky’s
18 interconnection framework premised on projected increases in DER penetration,
19 expanded use of advanced inverter functionality, and anticipated participation in
20 DER aggregation and wholesale markets.

21 Big Rivers and the Members acknowledge that DER technologies continue to
22 evolve, but caution against adoption of broad and anticipatory reforms not grounded

1 in present system conditions. DER penetration across the Big Rivers system
2 remains modest and localized, and cooperative distribution systems face operational
3 characteristics and engineering constraints fundamentally different from those of
4 urban investor-owned utilities.

5 Implementing statewide reforms designed to accommodate future or
6 projected DER conditions would require immediate expenditures, administrative
7 changes, and compliance obligations by cooperative systems, even where the
8 underlying system conditions do not yet warrant such measures. Incremental,
9 evidence-based evolution aligned with demonstrated need remains the appropriate
10 approach. The Commission should therefore exercise caution in adopting broad and
11 anticipatory reforms that would impose present-day obligations on cooperative
12 systems based on projected or unevenly distributed future conditions.

13 B. Limiting Utility Discretion and Freezing Technical Standards

14 KYSEIA proposes constraining utility discretion and requiring Commission
15 pre-approval of interconnection standard updates.

16 Big Rivers and the Members support transparency but oppose approaches
17 that would freeze or delay adoption of updated engineering and safety standards.
18 Industry standards such as IEEE 1547 and UL 1741 evolve rapidly. Utilities must
19 retain flexibility to implement updated standards necessary to maintain safety and
20 reliability, subject to Commission oversight through established regulatory
21 mechanisms rather than prior approval of every technical modification.

1 C. DER Aggregation and FERC Order No. 2222

2 KYSEIA treats DER aggregation under Order No. 2222 as imminent and
3 foundational.

4 Order No. 2222 governs wholesale market participation and expressly
5 preserves state and local authority over distribution system interconnection, safety,
6 and reliability.³ It does not compel revisions to Kentucky’s net metering or
7 interconnection Guidelines. Big Rivers and the Members support monitoring RTO
8 implementation while preserving distribution utility authority to prevent double
9 compensation, operational conflicts, and reliability risks.

10
11 III. CONCLUSION

12 Big Rivers and its Member Distribution Cooperatives support responsible
13 DER deployment that benefits participating members without compromising
14 reliability or shifting costs to others. The Commission should continue Kentucky’s
15 tradition of careful, evidence-based regulation and decline proposals that exceed
16 demonstrated need or disregard cooperative system realities.

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³ Kentucky Power Company, Supplemental Brief at 7–8 (Apr. 6, 2026) (discussing FERC Order No. 2222 and emphasizing preservation of state jurisdiction over distribution-level safety and interconnection)..

1 Filed this 20th day of April, 2026.

2 Respectfully submitted,

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