

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN ADJUSTMENT)	
OF ITS ELECTRIC RATES, A CERTIFICATE)	
OF PUBLIC CONVENIENCE AND NECESSITY)	CASE NO.
TO DEPLOY ADVANCED METERING)	2020-00349
INFRASTRUCTURE, APPROVAL OF CERTAIN)	
REGULATORY AND ACCOUNTING)	
TREATMENTS, AND ESTABLISHMENT OF A)	
ONE-YEAR SURCREDIT)	

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
MOTION TO INTERVENE**

Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and moves for 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
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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' ("KU") net metering tariff. KYSEIA has special and distinct interests on behalf of its members, including its specific member below, but also as a solar association that represents solar companies that must disseminate information and calculate costs and rates of return based upon KU's net metering tariff and the interconnection of systems. KYSEIA is organized under the laws of the Commonwealth of Kentucky and is in good standing with the Kentucky Secretary of State. Both KYSEIA and Mr. Partymiller may also modify their current system and may construct and net meter on additional systems in the future. Both KYSEIA and Mr. Partymiller intend to receive electric service under a net metering tariff beyond the 25-year legacy period on its current system and any future systems including modified systems.
 - b. Wilderness Trace Solar, Inc., is a member of KYSEIA and takes service under KU's net metering tariff. Wilderness Trace Solar, Inc., is organized under the laws of the Commonwealth of Kentucky and is in good standing with the Kentucky Secretary of State. Wilderness Trace Solar, Inc., may also modify its current system and may construct and net meter on additional systems in the future. Wilderness Trace Solar, Inc., intends to receive electric service under a net metering tariff beyond the 25-year legacy period on its current system and any future systems including modified systems.
4. KU net metering customers currently receive service under Rider NMS, a tariff unique to net metering customers; accordingly, their interests are not similar to other customers who receive service under other KU tariffs.

5. Through the pending application, KU proposes to close Rider NMS (proposed to be renamed as “Rider NMS-1”) to all customers who have submitted an application for net metering service after the effective date of rates established in this proceedings.¹ Additionally, KU seeks approval of “Rider NMS-2,” which will apply to all new net metering service customers who have submitted an application for net metering service after the effective date of rates established in this proceedings.² The interests of applicants for service under Rider NMS and the proposed Rider NMS-2 are not similar to other customers who apply for service under other KU tariffs.
6. KU also proposes to modify interconnection procedures and fees through the proposed net metering tariff. KYSEIA has a special and distinct interest in these interconnection procedures and fees, as it not only represents customer generators and potential customer generators who are subject to those procedures and fees, it also represents the solar companies that will ultimately be assisting these customers and potential customers in complying with those interconnection procedures and applications. This is especially important to KYSEIA, as the Commission has recognized that the existing interconnection guidelines for distributed generation established in Administrative Case No. 2008-00169 must be updated, and has initiated its own investigation to do so.³ KYSEIA has been granted full intervention in that case.⁴ KYSEIA is the primary entity representing solar

¹ Application, KU Testimony, Volume 2, Direct Testimony of Robert M. Conroy, page 23, lines 6 - 11.

² *Id.*

³ Case No. 2019-00256, *Electronic Consideration of the Implementation of the Net Metering Act* (Ky. PSC Dec. 18, 2019), Order at 34. KYSEIA participated and submitted substantial comments in that case, as noted by the Order. *See id.*, at 19-23, 34. *See also* Case No. 2020-00302, *Investigation of Interconnection and Net Metering Guidelines*.

⁴ Case No. 2020-00302, *Investigation of Interconnection and Net Metering Guidelines* (Ky. PSC Nov. 6, 2020), Order at 1.

companies and customer generators on issues related to interconnection and therefore has special and distinct interests that will not otherwise be adequately represented by any other party in this proceeding.

7. The interests of KU's net metering customers, applicants for net metering service under Rider NMS, and applicants under the proposed Rider NMS-2 are separate and distinct from the interests of other customers of LG&E. The special interests of KU's net metering customers will not otherwise be adequately represented by any other party to this proceeding.
8. KYSEIA has extensive knowledge regarding net metering service and subject-matter expertise concerning net metering rate and service issues pertinent to this proceeding and 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.
9. KYSEIA's motion to intervene is filed prior to the last day for intervention requests per the procedural schedule.⁵ 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,



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⁵ (Ky. PSC Dec. 9, 2020), Order, Appendix at 1.

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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 16th day of December, 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.



Randal A. Strobo

CERTIFICATE OF SERVICE

Undersigned counsel certifies that it has transmitted on this 16th day of December, 2020, via electronic mail messages, this Motion to Intervene and the accompanying Read1st file for the electronic filing to the parties of record at the electronic mail addresses listed below. The Commission has not excused any party from electronic filing procedures for this case.

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