

APPENDIX

Exhibit	Description
A	Case No. 2020-00349, Application (filed Nov. 25, 2020), Filing Requirements 1 of 3 [PDF 115 of 1864]
B	Case No. 2020-00349, KU response to Kentucky Solar Industries Association, Inc.'s Initial Request for Information (filed Jan. 22, 2021), Item 17 [PDF 34, 35 of 52]
C	<i>Case No. 2020-00174, Electronic Application of Kentucky Power Company For (1) A General Adjustment Of Its Rates For Electric Service; (2) Approval Of Tariffs And Riders; (3) Approval Of Accounting Practices To Establish Regulatory Assets And Liabilities; (4) Approval Of A Certificate Of Public Convenience And Necessity; And (5) All Other Required Approvals And Relief, Order (KY P.S.C. May 14, 2021), pages 24 and 25</i>
D	Case No. 2020-00349, KU Response to Staff's Eighth Request for Information (filed Aug. 13, 2021), Item 2. [PDF 8, 9 of 1261]
E	Case No. 2020-00349, Order (KY P.S.C. Sept. 24, 2021), at page 48
F	Filing No. TFS2021-00411 (filed Oct. 13, 2021) P.S.C No. 20, Original Sheet No. 58
G	<i>Kentucky Utilities Company and Louisville Gas and Electric Company v. Public Service Commission of Kentucky, et al., Civil Action No. 21-CI-00872, Division II (Complaint filed Nov. 24, 2021), Complaint, pages 13 and 14</i>
H	KU Initial bill to Saylor
I	KU December 28, 2021, letter to Saylor
J	KU Subsequent bill to Saylor

K	Filing No. TFS2021-00467 (filed Nov. 9, 2021) P.S.C No. 20, First Revision of Original Sheet No. 58
L	<i>Kentucky Utilities Company, Rates, Terms, and Conditions for Furnishing Electric Service</i> , P.S.C. KY. No. 20, First Revision of Original Sheet No. 58, effective Sept. 24, 2021

EXHIBIT A

Standard Rate Rider

**NMS-2
Net Metering Service-2**

N

APPLICABLE

In all territory served.

AVAILABILITY

Available to any Customer-generator who owns and operates a generating facility located on Customer's premises that generates electricity using solar, wind, biomass or biogas, or hydro energy in parallel with Company's electric distribution system to provide all or part of Customer's electrical requirements, and who executes Company's Application for Interconnection and Net Metering on or after January 1, 2021. The generation facility shall be limited to a maximum rated capacity of 45 kilowatts.

Company's Application for Interconnection and Net Metering is available online at <https://geku.com/residential/net-metering>. Company will provide a paper application to Customer upon request.

BILLING

All Customer bills will be calculated in accordance with the Customer's standard rate schedule

ENERGY RATES & CREDITS

For each billing period, Company will (a) bill Customer for all energy consumed in accordance with Customer's standard rate and (b) Company will provide a dollar denominated bill credit for each kWh of production. The dollar denominated bill credit will be calculated by multiplying the total kWh of production within the billing period by the Non-Time-Differentiated SQF rate within tariff Sheet No. 55. Any bill credits greater than the Customer's total bill will be carried forward to future bills.

Unused credits existing at the time Customer's service is terminated, end with Customer's account, have no monetary value, and are not transferrable between locations.

TERMS AND CONDITIONS

Except as provided herein, service will be furnished under Company's Terms and Conditions applicable hereto. The Net Metering Service Interconnection Guidelines applicable to this Rider are at Sheet Nos. 108 *et seq.*

DATE OF ISSUE: November 25, 2020

DATE EFFECTIVE: With Service Rendered
On and After January 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

**Issued by Authority of an Order of the
Public Service Commission in Case No.
2020-00349 dated XXXX**

EXHIBIT B

KENTUCKY UTILITIES COMPANY

Response to Kentucky Solar Industries Association, Inc.'s

Initial Requests for Information

Dated January 8, 2021

Case No. 2020-00349

Question No. 17

Responding Witness: Robert M. Conroy / William Steven Seelye

- Q-17. Reference: Rider NMS-2 [PDF 115 of 1864] in the Section entitled Energy Rates and Credits, stating, in pertinent part, “Company will provide a dollar denominated bill credit for each kWh of production” and Seelye Direct at page 43 [PDF 47 of 491] lines 8-10 stating “Under the Companies’ proposed NMS-2 schedule, new customer-generators will be compensated for any net generation they supply to the grid (i.e., generation that exceeds their energy requirements during the month) at the avoided cost rate...” Please clarify the crediting and/or netting practice used in NMS-2 by identifying which of the examples below (a - d) is correct. If the example is incorrect, please explain why it is incorrect.
- a. A customer-generator produces 1,000 kWh in total during a month and consumes a total of 800 kWh. The customer pays the applicable tariff rate for 800 kWh of consumption and is credited for 1,000 kWh of production at the Rider SQF rate.
 - b. A customer-generator produces 1,000 kWh in total during a month and consumes a total of 800 kWh. The customer’s generation in excess of their energy requirements is 200 kWh, therefore the customer does not pay anything in form volumetric charges and is credited for 200 kWh of monthly excess generation at the Rider SQF Rate.
 - c. A customer-generator produces 1,000 kWh in total during a month and consumes a total of 800 kWh. Of the 1,000 kWh of production, 400 kWh is used directly behind the customer meter and 600 kWh is exported. The customer therefore pays for 400 kWh of consumption from the grid (i.e., 800 - 400) at the applicable tariff rate and is credited for 600 kWh of exports (i.e., 1000 - 400) at the Rider SQF Rate.
 - d. If crediting and/or netting is determined through a different practice, please explain using the above basic inputs of 1,000 kWh of total production, 400 kWh used directly on-site behind the customer meter, and 800 kWh of total consumption.
 - e. If subpart (c) of this information request presents the correct netting and crediting methodology, please clarify over what duration net customer exports are measured (i.e., instantaneous, 15-minute intervals, 60-minute intervals).

- A-17. The quoted rider NMS-2 language is not complete. As stated in the Rider NMS-2, “Company will (a) bill Customer for all energy consumed in accordance with Customer’s standard rate and (b) Company will provide a dollar denominated bill credit for each kWh of production.” The Company’s meters for Rider NMS-2 customers are capable of measuring energy flow in both directions (See KRS 278.466(2) - Each retail electric supplier serving a customer with eligible electric generating facilities shall use a standard kilowatt-hour meter capable of registering the flow of electricity in two (2) directions). Thus, over the billing period, the meter will accumulate the amount of energy delivered to the customer (i.e. energy consumed by the customer) and the amount of energy the customer-generator delivers to the Company (i.e. energy put back onto the grid). The customer-generator will pay the standard tariffed rate for energy consumed and will get a bill credit for energy put back onto the grid at the Rider SQF rate.
- a. Not correct. The hypothetical scenario does not indicated the amount of energy consumed and the amount of energy put back onto the grid as measured by the customers’ meter as discussed above.
 - b. Not correct. The hypothetical scenario does not indicated the amount of energy consumed and the amount of energy put back onto the grid as measured by the customers’ meter as discussed above.
 - c. The hypothetical scenario appears to represent the appropriate billing. Under this scenario, it appears that the amount of energy consumed as measured by the customers’ meter would be 400 kWh and the amount of energy put back onto the grid as measured by the customers’ meter would be 600 kWh.
 - d. Not applicable.
 - e. Based on the meter’s ability to measure the flow of electricity in two (2) directions, the measurement interval is instantaneous.

EXHIBIT C

design principles are relevant not only to the export rate structure, but also to the underlying retail rate that customer-generators pay for their energy consumption. When considering rate designs for either export or consumption, it is important to consider the above principles alongside the additional principles of stability and simplicity.

Rate Design: Netting Periods

The proposed NMS II tariff uses a net billing rate structure that compensates netted, excess customer exports at an avoided cost rate and permits customer self-consumption, effectively compensating the latter at the applicable retail rate.⁷³ The netting periods limit the amount of self-consumption that a customer-generator can achieve within a billing period. The netting periods were selected to register the majority of eligible solar generation in a single netting period.⁷⁴ Although time-of-use netting periods can more granularly match customer load to customer generation, the periods that Kentucky Power selected are not based on cost causation. The hours of the day with and without sunshine do not necessarily align with system costs. Further, Kentucky Power's netting periods do not match its Residential Experimental Time of Day tariff, nor do they match PJM's on- and off-peak periods. The proposed netting periods also significantly increase the complexity of the NMS rate design, without clear indication of their benefit. For the above reasons, the Commission finds that the proposed netting periods are not fair, just and reasonable, and therefore should be rejected. The Commission further finds that Kentucky Power shall continue to net the total energy

⁷³ Because of these rate structure characteristics, customer compensation is directly impacted by the underlying retail rate, such as the residential customer charge and volumetric rate. Therefore, the Commission's Order to increase the customer charge reduced the value of self-consumption.

⁷⁴ Kentucky Power's Response to Joint Intervenors' First Request for Information (filed Aug. 26, 2020) (Joint Intervenors' First Request), Item 5.

consumed and the total energy exported by eligible customer-generators over the billing period in NMS II consistent with the billing period netting period established in NMS I.

Avoided Cost Rate Calculation

Having reviewed the case record and being otherwise sufficiently advised, the Commission finds that Kentucky Power's proposed export rates based upon avoided costs as modified below reflect best practices in developing successor net metering rates, and are fair, just and reasonable.

Kentucky Power's avoided cost component proposals, including its COGEN-SPP tariff calculations, and associated workpapers⁷⁵ (Avoided Cost Model) inform its proposed export rate. The Commission finds Kentucky Power's high-level modeling approach to be a reasonable starting point for developing the avoided cost components. However, the Commission finds that numerous adjustments to Kentucky Power's model approach, inputs, and assumptions are necessary to ensure a just and reasonable estimate of avoided generation and transmission capacity, energy, and ancillary service costs. The Commission also finds that intervenors and the record support including additional avoided cost components to customers-generators through the export rate. Below, we address the methodology and estimate of each avoided cost that should be included in Kentucky Power's export rates.

Avoided Energy Cost

The Commission finds Kentucky Power's proposal to estimate avoided energy costs based on residual aggregate forward pricing contracts between counterparties to

⁷⁵ Vaughan Rebuttal Testimony at Exhibits AEV-R5 and AEV-R6; Kentucky Power's Response to Staff's Third Request, Item 1, Attachment 15.

EXHIBIT D

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Eighth Request for Information
Dated August 3, 2021

Case No. 2020-00349

Question No. 2

Responding Witness: Robert M. Conroy

- Q-2. Refer to the Supplemental Testimony of William Steven Seelye (Supplemental Seelye Testimony) in general.
- a. Confirm whether KU is still proposing an instantaneous netting approach for NMS-2 customers. In other words, confirm whether customer-generators will only be able to “self-supply”, i.e., use their own production kWh to offset their billed consumption kWh, during the precise intervals when their generators are producing. If KU is not proposing instantaneous netting, explain the proposed netting approach in detail and provide a numerical example.
 - b. Explain whether KU is proposing to compensate at the avoided cost export rate all excess generation that customer-generators supply to the grid, or whether the excess kWh generation will directly reduce billed kWh during other time intervals when consumption exceeds production.
 - c. In the first day of the billing period, from 12–1 p.m., if a customer-generator produces 10kWh and consumes only 7 kWh, explain whether the customer will be able to utilize those excess 3 kWh to offset their billable kWh later in the evening.
- A-2. The definition of “Net Metering” contained in KRS 278.465(4) and as used in KRS 278.465 to 278.468 is:
- (4) "Net metering" means the difference between the:
 - (a) Dollar value of all electricity generated by an eligible customer-generator that is fed back to the electric grid over a billing period and priced as prescribed in KRS 278.466; and
 - (b) Dollar value of all electricity consumed by the eligible customer-generator over the same billing period and priced using the applicable tariff of the retail electric supplier.

Thus, the “netting” is no longer based on a one-to-one (1:1) kilowatt-hour denominated energy credit and is in the form of a dollar-denominated bill credit (See KRS 278.466(4)).

- a. Confirmed. The Companies’ proposal remains that NMS-2 customers be compensated at NMS-2 rates for every kWh supplied to the Companies’ grid. See the responses to Joint Intervenors 1-3, KSIA 1-17, and Joint Intervenors 2-26.
- b. See the response to part a.
- c. In this example, assuming 3 kWh is the amount of energy produced to the Companies’ grid in that hour, the Companies would compensate the customer at the NMS-2 compensation rate for 3 kWh. The Companies would not use the 3 kWh excess energy to offset the customer’s prior or future consumption. Such a kWh energy offset goes against the definition of net metering contained in KRS 278.465(4).

EXHIBIT E

Based upon the evidence of record, the Commission finds that LG&E/KU's proposed methodology for NMS 2 netting period is not fair, just and reasonable, and should be rejected. This is because LG&E/KU's proposed instantaneous credit for all energy exported on to the grid is inconsistent with the plain language of KRS 278.465(4), which provides that "net metering means the difference between" the dollar value of all electricity generated by an eligible customer-generator that is exported to the grid over a billing period and the dollar value of all electricity consumed by the eligible customer-generator over the same billing period.

Consistent with our finding in Case No. 2020-00174 and KRS 278.465(4), the Commission finds that LG&E/KU should continue to net the total energy consumed and the total energy exported by eligible customer-generators over the billing period in NMS 2 consistent with the billing period netting period establishes in NMS 1. The Commission further finds that, because the energy charge is based upon electricity consumed, the energy charge and any riders that are based on a per kWh charge should be netted against energy exported pursuant to KRS 278.465(4).

Avoided Cost Rate Calculation

Having reviewed the case record and being otherwise sufficiently advised, the Commission finds that LG&E/KU's proposed export rates based upon avoided costs as modified below reflect best practices in developing successor net metering rates, and are fair, just and reasonable.

Avoided Energy Cost: LG&E/KU based their avoided energy cost for NMS 2 customers on the avoided energy cost established for QFs, which the Commission found

EXHIBIT F



a PPL company

VIA ELECTRONIC TARIFF FILING SYSTEM

Linda C. Bridwell, PE
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Kentucky Utilities Company
State Regulation and Rates
220 West Main Street
PO Box 32010
Louisville, Kentucky 40232
www.lge-ku.com

Michael E. Hornung
Manager Pricing/Tariffs
T 502-627-4671
F 502-627-3213
mike.hornung@lge-ku.com

October 13, 2021

RE: Electronic Application of Kentucky Utilities Company For An Adjustment of Its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit
Case No. 2020-00349

Dear Ms. Bridwell:

Pursuant to Ordering Paragraph fifteen (15) of the Commission's Order dated September 24, 2021, in the above-referenced proceeding, Kentucky Utilities Company files herewith revised tariff sheets of KU P.S.C. No. 20, reflecting the changes to its associated tariff pages and rates approved in said Order.

Please contact me if you have any questions concerning this filing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael E. Hornung', with a long, sweeping underline.

Michael E. Hornung

Attachment

**General Index
 Rates, Terms, and Conditions**

<u>Title</u>	<u>Sheet Number</u>
General Index	1
Territory Served	1.2
 SECTION 1 - Standard Rate Schedules	
RS Residential Service	5
RTOD-Energy Residential Time-of-Day Energy Service	6
RTOD-Demand Residential Time-of-Day Demand Service	7
VFD Volunteer Fire Department Service	9
GS General Service	10
GTOD-Energy General Time-of-Day Energy Service	11
GTOD-Demand General Time-of-Day Demand Service	12
AES All Electric School	13
PS Power Service	15
TODS Time-of-Day Secondary Service	20
TODP Time-of-Day Primary Service	22
RTS Retail Transmission Service	25
FLS Fluctuating Load Service	30
LS Lighting Service	35
RLS Restricted Lighting Service	36
LE Lighting Energy Service	37
TE Traffic Energy Service	38
PSA Pole and Structure Attachment Charges	40
EVSE Electric Vehicle Supply Equipment	41
EVC-L2 Electric Vehicle Charging Service – Level 2	42
EVC-FAST Electric Vehicle Fast Charging Service	43
Special Charges	45
Returned Payment Charge	
Meter Test Charge	
Disconnect/Reconnect Service Charge	
Meter Pulse Charge	
Unauthorized Connection Charge	
AMI Opt Out Charges	
 SECTION 2 – Riders to Standard Rate Schedules	
CSR-1 Curtailable Service Rider-1	50
CSR-2 Curtailable Service Rider-2	51
SQF Small Capacity Cogeneration Qualifying Facilities	55
LQF Large Capacity Cogeneration Qualifying Facilities	56
NMS-1 Net Metering Service-1	57
NMS-2 Net Metering Service-2	58
EF Excess Facilities	60
RC Redundant Capacity	61

DATE OF ISSUE: October 13, 2021

DATE EFFECTIVE: With Service Rendered
 On and After September 24, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Lexington, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2020-00349 dated September 24, 2021**

KENTUCKY PUBLIC SERVICE COMMISSION
Linda C. Bridwell Executive Director

EFFECTIVE 9/24/2021 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Standard Rate Rider

NMS-2
Net Metering Service-2

N

APPLICABLE

In all territory served.

AVAILABILITY

Available to any Customer-generator who owns and operates a generating facility located on Customer's premises that generates electricity using solar, wind, biomass or biogas, or hydro energy in parallel with Company's electric distribution system to provide all or part of Customer's electrical requirements, and whose eligible generating facility first attains in service status on or after September 24, 2021. The generation facility shall be limited to a maximum rated capacity of 45 kilowatts.

Each Customer-generator taking service under NMS-2 and a standard rate schedule with a two-part rate structure will be allowed to take service under a two-part rate structure for 25 years from the date on which the Customer-generator began taking service under NMS-2.

BILLING

All Customer bills will be calculated in accordance with the Customer's standard rate schedule

ENERGY RATES & CREDITS

For each billing period, Company will net the total energy consumed and the total energy exported by eligible customer-generators and will then (a) bill Customer for all energy consumed from Company in accordance with Customer's standard rate or (b) Company will provide a dollar denominated bill credit for each kWh Customer produces to the Company's grid to be applied to the energy charge and any riders that are based on a per kWh charge.

Dollar-denominated bill credit: \$0.07366 per kWh

Any bill credits not applied to a Customer's bill in a billing period are "unused excess billing-period credits." Any unused excess billing-period credits will be carried forward and drawn on by Customer as needed.

Unused excess billing-period credits existing at the time Customer's service is terminated end with Customer's account and are not transferrable between Customers or locations. For joint accounts, unused excess billing-period credits will be carried forward as long as at least one joint account holder remains in the same location.

TERMS AND CONDITIONS

Except as provided herein, service will be furnished under Company's Terms and Conditions applicable hereto. The Net Metering Service Interconnection Guidelines applicable to this Rider are at Sheet Nos. 108 *et seq.*

DATE OF ISSUE: October 13, 2021
DATE EFFECTIVE: With Service Rendered
On and After September 24, 2021
ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2020-00349 dated September 24, 2021

KENTUCKY PUBLIC SERVICE COMMISSION
Linda C. Bridwell Executive Director

EFFECTIVE 9/24/2021 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**General Index
 Rates, Terms, and Conditions**

<u>Title</u>	<u>Sheet Number</u>
General Index	1
Territory Served	1.2
 SECTION 1 - Standard Rate Schedules	
RS Residential Service	5
RTOD-Energy Residential Time-of-Day Energy Service	6
RTOD-Demand Residential Time-of-Day Demand Service	7
VFD Volunteer Fire Department Service	9
GS General Service	10
GTOD-Energy General Time-of-Day Energy Service	11
GTOD-Demand General Time-of-Day Demand Service	12
AES All Electric School	13
PS Power Service	15
TODS Time-of-Day Secondary Service	20
TODP Time-of-Day Primary Service	22
RTS Retail Transmission Service	25
FLS Fluctuating Load Service	30
LS Lighting Service	35
RLS Restricted Lighting Service	36
LE Lighting Energy Service	37
TE Traffic Energy Service	38
PSA Pole and Structure Attachment Charges	40
EVSE Electric Vehicle Supply Equipment	41
EVC-L2 Electric Vehicle Charging Service – Level 2	42
EVC-FAST Electric Vehicle Fast Charging Service	43
Special Charges	45
Returned Payment Charge	
Meter Test Charge	
Disconnect/Reconnect Service Charge	
Meter Pulse Charge	
Unauthorized Connection Charge	
AMI Opt Out Charges	
 SECTION 2 – Riders to Standard Rate Schedules	
CSR-1 Curtailable Service Rider-1	50
CSR-2 Curtailable Service Rider-2	51
SQF Small Capacity Cogeneration Qualifying Facilities	55
LQF Large Capacity Cogeneration Qualifying Facilities	56
NMS-1 Net Metering Service-1	57
NMS-2 Net Metering Service-2	58
EF Excess Facilities	60
RC Redundant Capacity	61

T
N

DATE OF ISSUE: October 13, 2021

DATE EFFECTIVE: With Service Rendered
 On and After September 24, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Lexington, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2020-00349 dated September 24, 2021**

Standard Rate Rider

**NMS-2
Net Metering Service-2**

N

APPLICABLE

In all territory served.

AVAILABILITY

Available to any Customer-generator who owns and operates a generating facility located on Customer's premises that generates electricity using solar, wind, biomass or biogas, or hydro energy in parallel with Company's electric distribution system to provide all or part of Customer's electrical requirements, and whose eligible generating facility first attains in service status on or after September 24, 2021. The generation facility shall be limited to a maximum rated capacity of 45 kilowatts.

Each Customer-generator taking service under NMS-2 and a standard rate schedule with a two-part rate structure will be allowed to take service under a two-part rate structure for 25 years from the date on which the Customer-generator began taking service under NMS-2.

BILLING

All Customer bills will be calculated in accordance with the Customer's standard rate schedule

ENERGY RATES & CREDITS

For each billing period, Company will net the total energy consumed and the total energy exported by eligible customer-generators and will then (a) bill Customer for all energy consumed from Company in accordance with Customer's standard rate or (b) Company will provide a dollar denominated bill credit for each kWh Customer produces to the Company's grid to be applied to the energy charge and any riders that are based on a per kWh charge.

Dollar-denominated bill credit: \$0.07366 per kWh

Any bill credits not applied to a Customer's bill in a billing period are "unused excess billing-period credits." Any unused excess billing-period credits will be carried forward and drawn on by Customer as needed.

Unused excess billing-period credits existing at the time Customer's service is terminated end with Customer's account and are not transferrable between Customers or locations. For joint accounts, unused excess billing-period credits will be carried forward as long as at least one joint account holder remains in the same location.

TERMS AND CONDITIONS

Except as provided herein, service will be furnished under Company's Terms and Conditions applicable hereto. The Net Metering Service Interconnection Guidelines applicable to this Rider are at Sheet Nos. 108 *et seq.*

DATE OF ISSUE: October 13, 2021

DATE EFFECTIVE: With Service Rendered
On and After September 24, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

**Issued by Authority of an Order of the
Public Service Commission in Case No.
2020-00349 dated September 24, 2021**

Andy Beshear
Governor

Rebecca W. Goodman
Secretary
Energy and Environment Cabinet



Commonwealth of Kentucky
Public Service Commission

211 Sower Blvd.
P.O. Box 615
Frankfort Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

December 2, 2021

Kent A. Chandler
Chairman

Amy D. Cabbage
Vice Chairman

Marianne Butler
Commissioner

Michael E. Hornung
LGE and KU Energy
220 West Main St
Louisville, KY 40202

RE: Filing No. **TFS2021-00411**
Tariffs per Order in Case No. 2020-00349.

Dear Michael E. Hornung:

The above referenced filing has been received and reviewed. An accepted copy is enclosed for your files. You may also use the following link to access documents related to this filing.

<https://psc.ky.gov/trf4/TRFListFilings.aspx?ID=TFS2021-00411>

Sincerely,

A handwritten signature in blue ink that reads "Linda C. Bridwell".

Linda C. Bridwell
Executive Director

EXHIBIT G

billing period by the Non-Time-Differentiated SQF rate within tariff
Sheet No. 55.¹³

47. In the Commission's September 24, 2021 Order in both of the Companies' rate cases, however, the Commission rejected the Companies' proposed dollar-value netting approach and instead required the Companies to implement a two-step netting approach. In the first step, in each billing period an NMS-2 net metering customer's energy consumed from the grid (in kWh) would be subtracted from or netted against the customer's energy exported to the grid (in kWh).¹⁴ In the second step, the difference resulting from this kWh-to-kWh netting would then be assigned a dollar-value using either the customer's standard tariff rate (if the customer was a net consumer for the billing period) or the NMS-2 compensation rate (if the customer was a net producer for the billing period).¹⁵

48. The Companies sought reconsideration of the Commission's rejection of dollar-value netting for Rider NMS-2, noting that the two-step kWh-to-kWh netting the Commission required was inconsistent with KRS 278.465(4) and 278.466(3), which require a one-step dollar-value netting only and contain no reference to the Commission's imposed first step of energy netting for net metering customers who are not grandfathered under KRS 278.466(6) before assigning a dollar value.

49. The Commission's November 4, 2021 Order granted rehearing for the netting issue the Companies had raised, but only "for the limited purpose of correcting an inadvertent omission,"

¹³ See *id.*

¹⁴ See Exhibit B, Commission's September 24, 2021 Orders issued in Case Nos. 2020-00349 and 2020-00350, at page 48 ("Consistent with our finding in Case No. 2020-00174 and KRS 278.465(4), the Commission finds that LG&E/KU should continue to net the total energy consumed and the total energy exported by eligible customer-generators over the billing period in NMS 2 consistent with the billing period netting period establishes in NMS 1.").

¹⁵ See *id.*

not to change the substance of its September 24, 2021 Order rejecting dollar-value netting for NMS-2 customers.¹⁶

50. The Commission's September 24, 2021 and November 4, 2021 Orders reject the one-step dollar-value netting required by KRS 278.465(4) and KRS 278.466(3) and instead require a two-step netting approach that first nets energy on a kWh-to-kWh basis and then dollar-values the difference which is contrary to the text of Kentucky's Net Metering Statutes. In doing so, the Commission has exceeded its statutory powers by ignoring the statutory text of KRS 278.465(4) and 278.466(3) to substitute its own preferred net metering billing policy.

51. The Commission's Orders of September 24, 2021, and November 4, 2021, as to its findings regarding the Companies' Rider NMS-2 netting approach are unlawful, unreasonable, and arbitrary.

WHEREFORE, the Companies request an Order from the Court that:

1. Finds the Commission's rejection of the Companies' proposed Rider NMS-2 netting approach was unlawful, unreasonable, and arbitrary as contrary to KRS 278.465(4) and 278.466(6);
2. Enjoins and prohibits the Commission from any action to enforce the Commission's unlawful determination made in the Orders of September 24, 2021, and November 4, 2021 concerning the netting period for the Companies' Rider NMS-2 tariffs;
3. Directs the Commission to approve the Companies' proposed Rider NMS-2 netting approach as filed in the Companies' proposed tariffs filed with the Commission on November 25, 2020; and
4. Any other relief to which KU and LG&E may be entitled.

¹⁶ See Exhibit C, Commission's November 4, 2021 Orders issued in Case Nos. 2020-00349 and 2020-00350, at pages 11-12.

EXHIBIT H

Mailed 12/28/21 for Account # [REDACTED]



a PPL company

BILLING SUMMARY

Previous Balance	181.00
Payment(s) Received	-181.00
Balance as of 12/27/21	\$0.00
Current Electric Charges	66.32
Current Taxes and Fees	4.62
Total Current Charges as of 12/27/21	\$70.94
Budget Amount	181.00
Total Amount Due	\$181.00

AMOUNT DUE
\$181.00

DUE DATE
1/21/22

Online or phone payments made before 7 pm ET will be posted same day.

Account Name: AL SAYLOR
Service Address: [REDACTED]
Online Payments: lge-ku.com
Telephone Payments: (859) 255-0394, press 1-2-3
 24 hours a day; \$2.00 fee
Customer Service: (859) 255-0394
 M-F, 7am-7pm ET
Walk-in Center: 1 Quality Street
 Lexington, KY 40507
 M-F, 9am-5pm ET

Next read will occur 1/24/22 - 1/26/22 (Meter Read Portion 16)

⚡ CURRENT METER AND USAGE INFORMATION

Rate: Residential Service - Net Metering

	Meter Number	Previous Read Date	Previous Reading	Current Read Date	Current Reading	Read Code*	Meter Multiplier	Usage kWh	Demand (kW)
kWh	2408834	11/23/21	352	12/27/21	1365	R	1	1,013	
kWhGEN	2408834	11/23/21	203	12/27/21	747	R	1	-544	
Total Usage								469	

⚡ CURRENT ELECTRIC CHARGES

Rate: Residential Service - Net Metering

Basic Service Charge (\$0.53 x 34 Days)	18.02
Energy Charge (\$0.0967 x 163 kWh)	15.76
Energy Charge (\$0.09699 x 306 kWh)	29.68
Electric DSM (\$0.00083 x 469 kWh)	0.39
Fuel Adjustment (\$0.00175 x 469 kWh)	0.82
Economic Relief Surcredit (\$-0.00068 x 469 kWh)	-0.32
Environmental Surcharge (2.600% x \$64.35)	1.67
Home Energy Assistance Fund Charge	0.30
Total Charges	\$66.32

Please return only this portion with your payment. Make checks payable to KU and write your account number on your check.

Amount Due 1/21/22	\$181.00
After Due Date, Pay this Amount:	\$186.44
WinterCare Donation:	
Total Amount Enclosed:	AUTOPAY

Account # [REDACTED]
Service Address: [REDACTED]

\$181.00 will be deducted from your account on payment due date



a PPL company
PO Box 25212
Lehigh Valley, PA 18002-5212

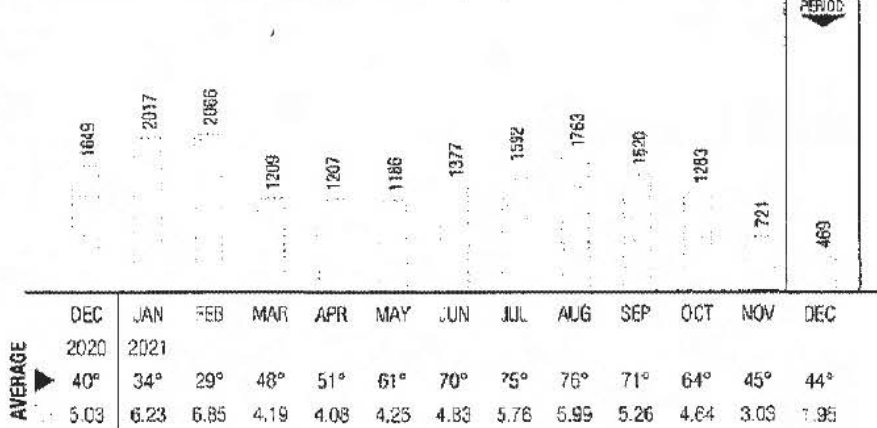
AL SAYLOR



BILLING PERIOD AT-A-GLANCE

	THIS YEAR	LAST YEAR
Average Temperature	44°	40°
Number of Days Billed	34	34
Avg. Electric Charges per Day	\$1.95	\$5.03
Avg. Electric Usage per Day (kWh)	13.79	48.50

MONTHLY USAGE



CURRENT BILLING PERIOD

Taxes & Fees

Rate Increase For School Tax (3.00% x \$66.02)	1.98
Franchise Fee-Lexington-Fayette (4.00% x \$66.02)	2.64
Total Taxes and Fees	\$4.62

BILLING INFORMATION

Late Payment Charge	
Late Charge to be Assessed After Due Date	\$5.44
Budget Payment Plan	
Actual billings to date	\$1,653.93
Budget Roll-In	\$0.00
Budget payments received to date	\$1,810.00
Budget settle month	January
Actual account balance after paying this bill	-\$337.07
Budget amount	\$181.00

Explanation of Meter Reading Codes

Meter Read Codes: R - Actual Read; V - Verified Read; E - Estimated Read; S - Self Read

**HELP YOUR NEIGHBORS
STAY WARM**



KU matches customers' donations to the WinterCare Energy Assistance Fund. Make your donation TODAY!

lge-ku.com

OFFICE USE ONLY: NM
MRU16311556, 6000000
P181.00
PF:Y 9B:P

BILLING INFORMATION (continued)

Additional Energy Use (kWh) Information Regarding Your Net Metering Service-1 Billing

Consumption credit for excess kWh generation before billing:	0 kWh
Energy credit for excess generation on this bill:	469 kWh
Excess energy used this period:	469 kWh
Energy credit remaining after billing (if any):	0 kWh

Rate Schedules

For a copy of your rate schedule, visit ge-ku.com/rates or call our Customer Service Department.



EXHIBIT I



a PPL company

Kentucky Utilities Company
Customer Services
One Quality St.
Lexington, Ky. 40507
lge-ku.com/netmetering

Al Saylor
[REDACTED]

December 28, 2021

Adjustment to Net Metering Energy Bill Credits

Dear Al Saylor,

We are reaching out because you are a customer taking service under KU's Net Metering tariff. On Sept. 24, 2021, an order by the Kentucky Public Service Commission (Case Number 2020-00349), changed the per-kilowatt-hour (kWh) bill credit for the electricity your generating facility exports to the energy grid.

The dollar-denominated bill credit that was approved and effective with service rendered after Sept. 24, 2021, is \$0.07366 per kWh through the Net Metering Service-2 (NMS-2) rate. Since that time, you have been receiving credit for electricity exported to the energy grid at the previously-approved higher Net Metering Service-1 (NMS-1) rate.

In order to reconcile the difference in the value of the exported energy for which you've been credited after Sept. 24, 2021, you will soon receive an adjusted billing statement. And, going forward, you will continue to receive credit for the electricity you export to the energy grid at the NMS-2 rate.

Please visit lge-ku.com/netmetering for more information and to review our net metering tariff approved by the Kentucky Public Service Commission.

Sincerely,

The Customer Services Team

EXHIBIT J

Mailed 12/30/21 for Account # [REDACTED]

AMOUNT DUE
\$181.00

DUE DATE
1/25/22

Online or phone payments made before 7 pm ET will be posted same day.

Account Name: **AL SAYLOR**
Service Address: [REDACTED]
Online Payments: lge-ku.com
Telephone Payments: (859) 255-0394, press 1-2-3
24 hours a day; \$2.00 fee
Customer Service: (859) 255-0394
M-F, 7am-7pm ET
Walk-in Center: 1 Quality Street
Lexington, KY 40507
M-F, 9am-5pm ET

Next read will occur 1/24/22 - 1/26/22 (Meter Read Portion 16)



a PPL company

BILLING SUMMARY

Previous Balance	0.00
Payment(s) Received	0.00
Balance as of 12/29/21	\$0.00
Current Electric Charges	80.35
Current Taxes and Fees	5.60
Total Current Charges as of 12/29/21	\$85.95
Budget Amount	181.00
Total Amount Due	\$181.00

CURRENT METER AND USAGE INFORMATION

Rate: Residential Service - Net Metering

	Meter Number	Previous Read Date	Previous Reading	Current Read Date	Current Reading	Read Code*	Meter Multiplier	Usage kWh	Demand (kW)
kWh	2408834	11/23/21	352	12/27/21	1365	R	1	1,013	
kWhGEN	2408834	11/23/21	203	12/27/21	747	R	1	-544	
Total Usage								469	

CURRENT ELECTRIC CHARGES

Rate: Residential Service - Net Metering

Basic Service Charge (\$0.53 x 34 Days)	18.02
Energy Charge (\$0.0967 x 361 kWh)	34.91
Energy Charge (\$0.0969 x 652 kWh)	63.24
Electric DSM (\$0.00083 x 1,013 kWh)	0.84
Fuel Adjustment (\$0.00175 x 1,013 kWh)	1.77
Economic Relief Surcredit (\$-0.0068 x 1,013 kWh)	-0.69
NMS-2 Billing Credit Applied	-40.07
Environmental Surcharge (2.600% x \$78.02)	2.03
Home Energy Assistance Fund Charge	0.30
Total Charges	\$80.35

Please return only this portion with your payment. Make checks payable to KU and write your account number on your check.

Amount Due 1/25/22	\$181.00
After Due Date, Pay this Amount:	\$186.43
WinterCare Donation:	
Total Amount Enclosed:	AUTOPAY

\$181.00 will be deducted from your account on payment due date

Account # [REDACTED]
Service Address: [REDACTED]

#218300128 0#
0000128
AL SAYLOR



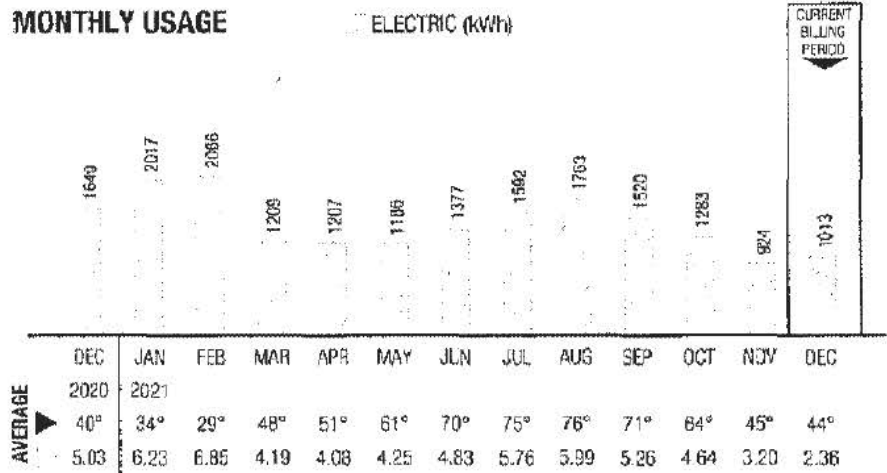
a PPL company
PO Box 25212
Lehigh Valley, PA 18002-5212



BILLING PERIOD AT-A-GLANCE

	THIS YEAR	LAST YEAR
Average Temperature	44°	40°
Number of Days Billed	34	34
Avg. Electric Charges per Day	\$2.36	\$5.03
Avg. Electric Usage per Day (kWh)	29.79	48.50

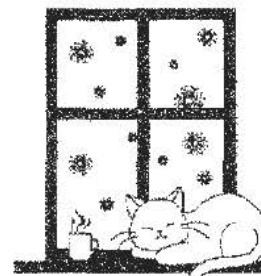
MONTHLY USAGE



Taxes & Fees

Rate Increase For School Tax (3.00% x \$80.05)	2.40
Franchise Fee-Lexington-Fayette (4.00% x \$80.05)	3.20
Total Taxes and Fees	\$5.60

**HELP YOUR NEIGHBORS
STAY WARM**



KU matches customers' donations to the Winter Care Energy Assistance Fund. Make your donation TODAY!

lge-ku.com

OFFICE USE ONLY: NM
MRU16311556, G000000
PF.Y eB:P

21 12291-060128-001 037-0311600-02800302

4

BILLING INFORMATION**Additional Information Regarding Your Net Metering Service-2 Billing**

Accumulated generation credit before this bill:	\$0.00
Generation credit for 544 kWh on this bill:	\$40.07
Credit applied to current energy charges:	\$40.07
Generation credit remaining after billing (if any):	\$0.00

Generation credit is calculated using the approved NMS-2 rate.

Late Payment Charge

Late Charge to be Assessed After Due Date	\$5.43
---	--------

Budget Payment Plan

Actual billings to date	\$1,674.17
Budget Roll-In	\$0.00
Budget payments received to date	\$1,810.00
Budget settle month	January
Actual account balance after paying this bill	-\$316.83
Budget amount	\$181.00

Explanation of Meter Reading Codes

Meter Read Codes: R - Actual Read; V - Verified Read; E - Estimated Read; S - Self Read

Rate Schedules

For a copy of your rate schedule, visit lge-ku.com/rates or call our Customer Service Department.



EXHIBIT K



a PPL company

Kentucky Utilities Company
State Regulation and Rates
220 West Main Street
PO Box 32010
Louisville, Kentucky 40232
www.lge-ku.com

Michael E. Hornung
Manager Pricing/Tariffs
T 502-627-4671
F 502-627-3213
mike.hornung@lge-ku.com

VIA ELECTRONIC TARIFF FILING SYSTEM

Linda C. Bridwell, PE
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

November 9, 2021

RE: Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit Case No. 2020-00349

Dear Ms. Bridwell:

Pursuant to Ordering Paragraph three of the Commission's Order dated November 4, 2021, in the above-referenced proceeding, Kentucky Utilities Company ("KU") files a revised tariff sheet of KU P.S.C. No. 20 reflecting the changes to its associated tariff page in accordance with the text of the Order.

More specifically, the Order corrected a sentence in the Commission's September 24, 2021 Order in the above-referenced proceeding to state:

Consistent with our finding in Case No. 2020-00174 and KRS 278.465(4), the Commission finds that LG&E/KU should continue to net *the dollar value of the total energy consumed and the dollar value of the total energy exported* by eligible customer generators over the billing period in NMS 2 consistent with the billing period netting period established in NMS 1.



a PPL company

(Emphases reflect text added by the Commission's Nov. 2, 2021 Order to the sentence in the Commission's Sept. 24, 2021 Order.)

KU understands the corrected text to require KU to calculate the dollar value of all energy consumed by an NMS-2 customer in a billing period and net that amount with the dollar value of all energy produced to KU by the NMS-2 customer in the same billing period. The revised tariff sheet KU is filing today reflects KU's understanding of that Order text and shows how KU will implement it.

Please contact me if you have any questions concerning this filing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael E. Hornung', with a long horizontal flourish extending to the right.

Michael E. Hornung

Attachment

Kentucky Utilities Company

P.S.C. No. 20, First Revision of Original Sheet No. 58
Canceling P.S.C. No. 20, Original Sheet No. 58

Standard Rate Rider

NMS-2

Net Metering Service-2

APPLICABLE

In all territory served.

AVAILABILITY

Available to any Customer-generator who owns and operates a generating facility located on Customer's premises that generates electricity using solar, wind, biomass or biogas, or hydro energy in parallel with Company's electric distribution system to provide all or part of Customer's electrical requirements, and whose eligible generating facility first attains in service status on or after September 24, 2021. The generation facility shall be limited to a maximum rated capacity of 45 kilowatts.

Each Customer-generator taking service under NMS-2 and a standard rate schedule with a two-part rate structure will be allowed to take service under a two-part rate structure for 25 years from the date on which the Customer-generator began taking service under NMS-2.

BILLING

All Customer bills will be calculated in accordance with Customer's standard rate schedule.

ENERGY RATES & CREDITS

For each billing period, Company will net the dollar value of the total energy consumed and the dollar value of the total energy exported by Customer as follows: Company will (a) bill Customer for all energy consumed from Company in accordance with Customer's standard rate and (b) Company will provide a dollar-denominated bill credit for each kWh Customer produces to the Company's grid.

T/N

T/N

D

Dollar-denominated bill credit:

\$0.07366 per kWh

The dollar-denominated bill credit will be applied only to the energy charge and any riders that are based on a per kWh charge. Any bill credits not applied to a Customer's bill in a billing period are "unused excess billing-period credits." Any unused excess billing-period credits will be carried forward and drawn on by Customer as needed.

T/N

T/N

Unused excess billing-period credits existing at the time Customer's service is terminated end with Customer's account and are not transferrable between Customers or locations. For joint accounts, unused excess billing-period credits will be carried forward as long as at least one joint account holder remains in the same location.

TERMS AND CONDITIONS

Except as provided herein, service will be furnished under Company's Terms and Conditions applicable hereto. The Net Metering Service Interconnection Guidelines applicable to this Rider are at Sheet Nos. 108 *et seq.*

DATE OF ISSUE: November 9, 2021

DATE EFFECTIVE: With Service Rendered
On and After September 24, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2020-00349 dated November 4, 2021

**KENTUCKY
PUBLIC SERVICE COMMISSION**

Linda C. Bridwell
Executive Director



EFFECTIVE

9/24/2021

PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Andy Beshear
Governor

Rebecca W. Goodman
Secretary
Energy and Environment Cabinet



Commonwealth of Kentucky
Public Service Commission

211 Sower Blvd.
P.O. Box 615
Frankfort Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

November 30, 2021

Kent A. Chandler
Chairman

Amy D. Cabbage
Vice Chairman

Marianne Butler
Commissioner

Michael E. Hornung
LGE and KU Energy
220 West Main St
Louisville, KY 40202

RE: Filing No. **TFS2021-00467**
Kentucky Utilities Company revised Net Metering 2 tariff to accommodate changes directed by the Commission within their November 4 order related to rehearing.

Dear Michael E. Hornung:

The above referenced filing has been received and reviewed. An accepted copy is enclosed for your files. You may also use the following link to access documents related to this filing.

<https://psc.ky.gov/trf4/TRFListFilings.aspx?ID=TFS2021-00467>

Sincerely,

A handwritten signature in blue ink that reads "Linda C. Bridwell".

Linda C. Bridwell
Executive Director

EXHIBIT L

Kentucky Utilities Company

One Quality Street
Lexington, Kentucky
www.lge-ku.com

Rates, Terms, and Conditions for Furnishing

ELECTRIC SERVICE

In all territory served as stated on Tariff Sheet No. 1.2 of this Book

PUBLIC SERVICE COMMISSION

OF KENTUCKY

DATE OF ISSUE: July 20, 2021
DATE EFFECTIVE: With Service Rendered
On and After July 1, 2021
ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

KENTUCKY
PUBLIC SERVICE COMMISSION

Linda C. Bridwell
Executive Director



EFFECTIVE

7/1/2021

PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Kentucky Utilities Company

P.S.C. No. 20, First Revision of Original Sheet No. 58
Canceling P.S.C. No. 20, Original Sheet No. 58

Standard Rate Rider

NMS-2

Net Metering Service-2

APPLICABLE

In all territory served.

AVAILABILITY

Available to any Customer-generator who owns and operates a generating facility located on Customer's premises that generates electricity using solar, wind, biomass or biogas, or hydro energy in parallel with Company's electric distribution system to provide all or part of Customer's electrical requirements, and whose eligible generating facility first attains in service status on or after September 24, 2021. The generation facility shall be limited to a maximum rated capacity of 45 kilowatts.

Each Customer-generator taking service under NMS-2 and a standard rate schedule with a two-part rate structure will be allowed to take service under a two-part rate structure for 25 years from the date on which the Customer-generator began taking service under NMS-2.

BILLING

All Customer bills will be calculated in accordance with Customer's standard rate schedule.

ENERGY RATES & CREDITS

For each billing period, Company will net the dollar value of the total energy consumed and the dollar value of the total energy exported by Customer as follows: Company will (a) bill Customer for all energy consumed from Company in accordance with Customer's standard rate and (b) Company will provide a dollar-denominated bill credit for each kWh Customer produces to the Company's grid.

T/N

T/N

D

Dollar-denominated bill credit:

\$0.07366 per kWh

The dollar-denominated bill credit will be applied only to the energy charge and any riders that are based on a per kWh charge. Any bill credits not applied to a Customer's bill in a billing period are "unused excess billing-period credits." Any unused excess billing-period credits will be carried forward and drawn on by Customer as needed.

T/N

T/N

Unused excess billing-period credits existing at the time Customer's service is terminated end with Customer's account and are not transferrable between Customers or locations. For joint accounts, unused excess billing-period credits will be carried forward as long as at least one joint account holder remains in the same location.

TERMS AND CONDITIONS

Except as provided herein, service will be furnished under Company's Terms and Conditions applicable hereto. The Net Metering Service Interconnection Guidelines applicable to this Rider are at Sheet Nos. 108 *et seq.*

DATE OF ISSUE: November 9, 2021

DATE EFFECTIVE: With Service Rendered
On and After September 24, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2020-00349 dated November 4, 2021

**KENTUCKY
PUBLIC SERVICE COMMISSION**

Linda C. Bridwell
Executive Director



EFFECTIVE

9/24/2021

PURSUANT TO 807 KAR 5:011 SECTION 9 (1)