

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILINGS OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY AND)	
KENTUCKY UTILITIES COMPANY TO REVISE)	
PURCHASE RATES FOR SMALL CAPACITY AND)	CASE NO.
LARGE CAPACITY COGENERATION AND)	2023-00404
POWER PRODUCTION QUALIFYING FACILITIES)	
AND NET METERING SERVICE-2 CREDIT)	
RATES)	

**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
1038 Brentwood Court, Ste. B
Lexington, Kentucky 40511
(877) 312-7456
info@kyseia.org

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 Company's ("KU") net metering tariff. KYSEIA has special and distinct interests on behalf of its members, including its specific members 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 on their current systems and any future systems including modified systems.
- b. Wilderness Trace Solar, Inc., is a member 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 on its current system and any future systems including modified systems.
- c. Solar by Ecos LLC is a member of KYSEIA and takes service under Louisville Gas and Electric Company's ("LG&E" and with KU, collectively,

“Companies”) net metering tariff. Solar by Ecos LLC is organized under the laws of the Commonwealth of Kentucky and is in good standing with the Kentucky Secretary of State. Solar by Ecos LLC may also modify its current system and may construct and net meter on additional systems in the future. Solar by Ecos LLC intends to receive electric service under a net metering tariff on its current system and any future systems including modified systems.

4. LG&E and KU net metering customers currently receive service under a net metering a tariff unique to net metering customers; accordingly, their interests are not similar to other customers who receive service under other LG&E and KU tariffs.
5. The investigation of the proposed tariff filings focuses upon revisions to LG&E’s and KU’s purchase rates for small capacity and large capacity cogeneration and power production qualifying facilities and Net Metering Service-2 credit rates. The proposals impact all customers in the Companies’ service territories who apply for and take service under the Net Metering Service-2 tariff provisions and also all customers who have small capacity and large capacity cogeneration and power production qualifying facilities. The interests of customers and applicants for service under these tariff provisions are not similar to other customers who apply for service under other LG&E and KU tariffs.
6. The interests of LG&E’s and KU’s net metering customers and applicants for net metering service under Net Metering Service-2 are separate and distinct from the interests of other customers of LG&E and KU. The special interests of the

Companies' net metering customers will not otherwise be adequately represented by any other party to this proceeding.

7. KYSEIA's motion to intervene is filed prior to the date set forth in the Commission's Order of procedure for filing requests for intervention into this investigation. 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,

/s/ David E. Spenard

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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 3rd day of January 2024, in conformity with the Commission's April 14, 2023 Order of procedure in the instant case. Pursuant to the Commission's Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

Notice And Certification Concerning Service

No party has been excused from the electronic filing procedures in the instant proceeding.

/s/ David E. Spenard