### COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR (1) A GENERAL	)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC	)	
SERVICE; (2) APPROVAL OF TARIFFS AND	)	CASE NO.
RIDERS; (3) APPROVAL OF CERTAIN	)	2025-00257
REGULATORY AND ACCOUNTING	)	
TREATMENTS; AND (4) ALL OTHER REQUIRED	)	
APPROVALS AND RELIEF	)	

# 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 matt@solar-energy-solutions.com

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 has special and distinct interests on behalf of its members, including the specific members below, and also as a solar association that represents solar companies

that must disseminate information and calculate costs and rates of return based upon Kentucky Power Company's (also "Kentucky Power") net metering tariffs, cogeneration and qualifying facility tariffs, and the interconnection of systems. KYSEIA will participate in this proceeding through:

- a. Matt Partymiller, President of KYSEIA. 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 Kentucky Power's net metering tariffs, COGEN tariffs, and the interconnection of systems.
- b. Appalshop, Inc., a Kentucky nonprofit in good standing with the Kentucky Secretary of State and a member of KYSEIA and a Kentucky Power customer receiving electric service under Kentucky Power's Tariff N.M.S. Appalshop may also modify its current system and may construct and net meter on additional systems in the future. Appalshop will participate in this proceeding through Brandon Jent, Director of Development & Strategic Partnerships.
- 4. Kentucky Power net metering customers currently receive service under tariff provisions unique to net metering customers; accordingly, their interests are not like other customers who receive service under other Kentucky Power tariffs.
- 5. Kentucky Power qualifying facility customers currently receive service under tariff provisions unique to qualifying facility customers; accordingly, their interests are not like other customers who receive service under other Kentucky Power tariffs.
- 6. Through the pending application, Kentucky Power proposes changes to its Net Metering Service II (N.M.S. II), Cogeneration and/or Small Power Production -- 100 KW or Less

(COGEN/SPP I), and Cogeneration and/or Small Power Production -- Over 100 KW (COGEN/SPP II) tariffs. KYSEIA and its members have an interest in each of these categories; accordingly, their interests are not like other customers who receive service under other Kentucky Power tariffs.

- 7. The interests of Kentucky Power's net metering customers and applicants for net metering service are separate and distinct from the interests of other customers of Kentucky Power.

  The special interests of Kentucky Power's net metering customers will not otherwise be adequately represented by any other party to this proceeding.
- 8. The interests of Kentucky Power's qualifying facility customers and applicants for qualifying facility service are separate and distinct from the interests of other customers of Kentucky Power. The special interests of Kentucky Power's qualifying facility customers will not otherwise be adequately represented by any other party to this proceeding.
- 9. The interests of Kentucky Power's customers that require interconnection service and approvals are separate and distinct from the interests of other customers of Kentucky Power. The special interests of Kentucky Power's customers that require interconnection service and approvals will not otherwise be adequately represented by any other party to this proceeding.
- 10. KYSEIA's motion to intervene is timely filed.

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,

(x) David E. Spenard Randal A. Strobo David E. Spenard STROBO BARKLEY PLLC 730 West Main Street, Suite 200 Louisville, Kentucky 40202 Phone: 502-290-9751

Phone: 502-290-9751 Facsimile: 502-378-5395

Email: rstrobo@strobobarkley.com Email: dspenard@strobobarkley.com

Counsel for KYSEIA

## NOTICE CERTIFICATION FOR FILING

Undersigned counsel provides notices 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 17th day of September 2025. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

### NOTICE CONCERNING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David E. Spenard