



Red Bird Mission

70 Queendale Center
Beverly, KY 40913-9607

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

P 606.598.3155 • F 606.598.3151 • Email rbm@rbmission.org • www.rbmission.org

Date: 10/14/2019

To: Kentucky Public Service Commission

Re: PSC Case Number 2019-00256

My name is Kari Collins, and I am the Executive Director of Red Bird Mission, Inc. Red Bird Mission has existed for nearly 100 years and is located in the corner of Bell, Clay and Leslie Counties where we serve over 2,000 citizen who are living in poverty each year. We are a 501c3 that has been providing education, health care, resources and supports since 1921. Our nationally accredited private school provides a quality education to 200 students, pre-k through 12th grade. Even though it costs us nearly \$7,000 a year to educate each child, to provide an affordable education for the families we serve our maximum annual tuition is \$610. We have approximately 2300 volunteers that come to Red Bird Mission annually to help with projects like repairing homes, replacing leaking roofs, building ramps, helping with clean water projects, septic installations and providing hearing clinics. We are the major employer in an area where jobs are scarce. Eighty-five (90) of our nearly one hundred (100) full time employees are born and raised here in these mountains. Next to payroll, our utilities are our biggest expense. There are months that our bills for electricity run over \$35,000.00.

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Evaluation of the cost of net metering should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. The benefits of solar offer to the energy grid includes avoided energy costs, reduced line losses, increased grid resiliency, along with environmental and social benefits, reduced public health threats, and job creation and economic development in an area desperate for economic opportunities.

From what I have learned and researched, solar is working in Kentucky under the current net metering law. Non-profits, community organizations/centers, churches, and small businesses currently benefit from rooftop solar energy. We are hopeful to be amongst them.

We at Red Bird Mission are looking at every viable option, including the use of rooftop solar, to reduce our expenses. This includes our hope to utilize rooftop solar. We are committed to being impeccable stewards of the donations we receive to help ensure a healthy, sustainable future for those we serve.

Kari Collins, Executive Director
Red Bird Mission, Inc.
70 Queendale Center
Beverly, Ky. 40913

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

1153 KY 718
Flat Lick, KY 40935

10/15/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more. Specifically, it is a responsible and viable option to the harmful coal mining practices. The short and long term negative impacts of coal mining are undeniable. There is no reason to keep Kentucky dependent on an industry so harmful to the residents, workers, and environment. Kentucky needs to incentive solar and allow the commonwealth to move forward, beyond coal.

Thank you for your consideration.

Sincerely,

Brian Morris

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10/15/19

OCT 15 2019

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

PUBLIC SERVICE
COMMISSION

Comments on PSC Case Number 2019-00256

I am a residential homeowner in Louisville who has invested a very sizeable amount of personal funding in making our house nearly net-neutral thanks to solar power generation, while continuing to rely on our permanent grid connection to LG&E's reliable and high-quality electric service.

My intent is to make our nice home as frugal in utility costs as possible for our family, including an adult somewhat disabled family member, and less dependent on my financial contributions including utility bills. I am aware that I am as mortal as any other human being and will not be around forever. However, we are very aware of important secondary benefits of our sizable investment to our community in the city we love, Louisville.

As a U.S. military officer and, toward the end of my military career, a military diplomat, I have been posted to several places where the local grid, mostly state-owned, was decrepit and therefore unreliable. The usual result was that in addition to being tied to the electrical grid, a majority of house owners and small shop owners also invested in private diesel power generators. This led to the following effects: the generators needed a nearly constant supply of fuel, which necessitated a small fuel tank at each property. Generators and especially diesel fuel being very stealable and, in the instance of diesel, untraceable once stolen, this in turn necessitated everyone who maintained their own generator and fuel storage at their home or business, to also invest in a rotating set of armed guards. I had seen this first-hand during my postings to the post-Soviet countries of Turkmenistan, Georgia, Uzbekistan and Armenia – all of them industrialized and decently educated societies. Here in the United States, we avoid such money-losing scenarios thanks to the reliable and high-

quality electric service provided by our utility companies. In that light, I am a consistent fan of LG&E.

I want to remind you that in contrast to the examples I list above, my and my fellow city neighbors' personal investment in solar power generation on our properties not only helps to stabilize our families' finances for the foreseeable future, but also allows LG&E and other utilities across our urban and rural areas to better plan for future power demand surges... in our instance in South Louisville, it may well significantly delay or actually avoid LG&E building or expanding another electricity generation plant near South Louisville, which in terms of pollution density actually helps all of us in the city while avoiding added labor and investment maintenance costs for LG&E.

In conclusion, I want to state that I put around \$90,000 of my own money into our solar generation capacity, seeing it as an investment in ourselves and also into our community's stability. I ask you to consider this as a private citizen's decision, in contrast to decisions of citizens on Turkmenistan, Georgia, Uzbekistan and Armenia, who have to invest in private generators, fuel delivery and armed guards to secure them, because their local grids are not at the standard and quality of service established and maintained by LG&E. In that light, I see our family's investment into PV generation as complementary to LG&E's immense investments, and when adjusted for scale, equally deserving of consideration. Finally, I see LG&E and ourselves as partners in this and ask the Commission to see our investments and LG&E's investments as different in scale yet equally deserving of consideration in your rate-setting work for the Commonwealth.

With regards,

Martin W. Chadzynski
3719 Whitehall Court,
Louisville, KY 40272

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Regarding "Case No. 2019-00256"

October 13, 2019

To whom it may concern:

I am an eastern Kentucky resident writing you with concerns about how solar energy will be valued in our state. People in this part of the state are suffering hard times with the down turn in the coal industry. Many have spoken out at PSC hearings about how electricity rate increases will force them to choose between having food to eat or staying warm. People from our community centers, where residents get all kinds of services, say they will have to close their doors if there are no alternatives to reducing their power bills.

Rooftop solar power, with a fair rate for net metering, does provide an alternative means for organizations, businesses, churches and individuals to control their energy costs while providing energy back into the system to be used by other customers. And in eastern Kentucky solar installation companies have been a bright spot for new job creation in an otherwise dark picture. Solar is working for all Kentuckians under the current net metering law that offers a 1:1 ratio.

As you make your determination, evaluation of the cost of net metering should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. The benefits that solar offers to the energy grid, and to Kentucky, include avoided energy costs, reduced line losses, avoided investment in new capacity, reduced financial risks from volatile fuel sources, increased grid resiliency, environmental and social benefits, reduced public health threats, and job creation and economic development. The PSC should consider all of these benefits when determining the value of solar.

Sincerely,

Amelia Pickering
14 Church Street
Whitesburg, KY 41858

October 14, 2019

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Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

OCT 15 2019
PUBLIC SERVICE
COMMISSION

Comments on PSC Case Number 2019-00256

SunWind Power has been in business for 15 years and we have grown a \$5k initial investment into an organization that impacts over 350 jobs annually with annual revenues over \$1M. We are now faced with the very real possibility of having to shut down operations next year because the utilities have pushed through this change in Net Metering. We have over a hundred vendors and subcontractors - which include electrical engineers, electricians, roofers, builders, tree service companies, concrete workers, fabricators, crane operators, etc. Our small company pays large sums annually in KY sales tax on all the equipment we install. We pay incredible sums for insurance and training to maintain our credibility. All of this economic activity will be turned off if the PSC doesn't properly value the benefits of solar energy. This valuation should definitely include the time of generation, which is a fundamental factor in consideration of the value of energy. To pin the rate of compensation on a fixed rate does not result in a equitable rate for either party. The ability of PV systems to provide grid reliability and power factor correction also needs to be considered in the compensation algorithm. Utility companies are rapidly deploying large scale solar arrays and selling "shares" to rate payers at significantly higher prices than if those same customers were to install at their residences. We simply ask that the value of solar energy be fully integrated into future electric rates and not be left out fo the economic evaluation.

Jeremy Coxon NABCEP

Certified MWBE

5324 Hanka Rd, Floyds Knobs IN 47119

3214 Cawein Way
Louisville, KY 40220-1934

10/11/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

In states like Minnesota (Farrell, Institute For Local Self-Reliance, 2014) and Maine (Norris, Gruenhagen, Grace, Yuen, Perez, and Rábago 2015), studies commissioned by state Public Utility Commissions have found that distributed solar generation is worth more than its retail price and that the benefits of distributed solar energy consistently outweigh the costs.

Solar is working for all Kentuckians under the current net metering law. Non-profits, community centers, churches, and small businesses all benefit from rooftop solar energy in Kentucky. Some examples include: the Post Medical Clinic in Mount Sterling, the Catholic Action Center in Lexington, People's Self-Help Housing in Lewis County, and the Campton Baptist Church in Wolfe County. Thank you for your consideration.

Sincerely,

Greg Perri

2642
Hyden, KY 41749

10/11/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Thank you for your consideration.

Sincerely,

Tim Baker

1101 Beaumont Centre Ln
Lexington, KY 40513

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10/11/19

OCT 15 2019

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

In implementing the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, the state's power grid, and public health.

Studies in other states, particularly Minnesota and Maine, have found that the benefits of distributed solar significantly outweigh the costs. The benefits notably include avoided costs from reduced peak demand, which can reduce the need for additional capacity investments in the long term, as well as reduced strain on grid infrastructure. By supplanting more pollution-intensive energy sources, distributed solar also reduces air and water pollution and greenhouse gas emissions. Given Kentucky's high asthma rates, reduced air pollution would be a significant public health benefit.

A detailed value of solar study, modeled on those carried out by Minnesota, Maine, and other states, that accounts for these and other benefits would be a worthy addition to the record and of great benefit to this decision-making process. From publicly available information, the Kentucky Resources Council has estimated that net metering adds less than a cent at most to the average ratepayer's monthly bill, and may in fact provide a net benefit (_The Economic Impact On Kentucky Residential Customers Of Energy "Sold" To Utilities From Net Metering Solar Customers in 2016_). With additional information at its disposal, the PSC could make a more accurate determination.

In addition, I also urge you to carry out this process with maximum openness and transparency. Any information about the costs and benefits of distributed solar used in the decision-making process should be made available to the public. Interested parties should be able to participate in the process through both public comment and intervention; the decision to block advocacy groups from formally intervening in the 2018 LG&E and KU rate cases should not become the norm.

Thank you for your consideration.

Sincerely,

Matthew Gidcomb, Kentuckians For The Commonwealth

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

4655 Cadiz Rd
Hopkinsville, KY 42240-8544

10/12/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our communities! It is affordable, clean energy, and available to most anyone! Please consider net metering in a positive manner!

Thank you for your consideration.

Sincerely,

Bonnie Thorpe

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

6769 Mount Pleasant Rd
Ewing, KY 41039-7840

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, to our energy grid and to public health, economic development, and climate protection. Solar energy is a one of the new types of energy we need to promote as we strive to shift to sustainable sources of energy. Kentucky has relied on coal for a long time and coal has provided economic benefits to the mine owners. However, the coal industry has benefited at the expense of miners, who are still damaging their health, decreasing their life expectancy and suffering devastating effects on their quality of life.

The utilities indicate that the rooftop solar customers are not carrying their weight of the cost of maintaining the energy grid. But evidence shows that net metering costs are negligible, costing the average ratepayer less than \$0.01 per month (KY Resources Council 2018). Other studies report similar findings. Two other states (Maine and Minnesota), in fact, found that distributed solar generation is worth more than its retail price and that the benefits of distributed solar energy consistently outweigh the costs. Individuals who install rooftop solar do so at a significant cost to themselves, while providing the utilities with additional energy they can use at peak use times.

The Kentucky Public Service Commission must live up to its name and provide a service to the public at large and not just to the utility companies. All Kentuckians, including low-income residents, environmental advocates and small businesses that are attempting to have an impact on our battle with climate change, should be involved in the how the PSC handles rate changes and concerns. All Kentuckians---the Public for whom the PSC is providing Service---are impacted by PSC 's decisions and deserve a voice.

Thank you for your consideration.

Sincerely,

Susan McGee

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

4100 Old Frankfort Pike
Lexington, KY 40510-9623

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

State and federal governments should provide tax or financial benefit to encourage home owners to install roof top solar as the investment to home owners is substantial. Current net metering parameters should be kept in place as the cost is, at this time, is not significant enough to merit change. The current utility company options for solar energy farm support are not financially enticing for consumers. Installed roof top makes more sense. Utilizing large tracts of land for solar farms is less desirable than roof top as the land utilized is often productive agricultural acreage and becomes aesthetically deficit. The US has privatized utilities at a significant expense to users. I am not suggesting an ownership change at this time. However, it is not fair for corporate America to exercise greed when private home owners are investing in personal energy development both for personal usage and for the benefit of the planet in these uncertain times. The Public Service Commission should not be handed the task to come up with a controversial and confusing rate scheme for installers of roof top solar as the net loss to utility companies is so low that it is not warranted. We need to think carefully about climate change and leave all doors open to encourage environmentally minded individuals to help make the world a safer place. At this time, no change is needed for net metering.

Sincerely,

B.J. Bentley

444 Marquis Ave
Lexington, KY 40502-2110

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Specifically, evaluation of the cost of net metering should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. The benefits of solar offer to the energy grid, and to Kentucky, include:

- 1) avoided energy costs - Because solar panels are most productive on sunny summer days, the times when energy costs are high and demand peaks, rooftop solar lowers costs by allowing utilities to avoid purchasing peaking power on the market or using expensive backup power sources;
- 2) reduced line losses - Energy distributed from homes has a shorter distance to travel, which is more efficient since less energy is lost in the distribution process. Rooftop solar reduces wear and tear on the grid because the electricity travels a shorter distance;
- 3) avoided investment in new capacity - Rooftop solar can eliminate the need for new capacity investments, saving money for ratepayers and utility companies. Solar can also help reduce the need for costly pollution controls like scrubbers for smokestacks;
- 4) reduced financial risks from volatile fuel sources - Increasing solar on the grid helps reduce the financial risks associated with fuels that often have a volatile price, like natural gas. Solar also allows individuals to reduce their monthly bills;
- 5) increased grid resiliency- Rooftop solar helps reduce peak energy needs, which can overload a system and cause outages. Due to its distributed nature,

it decentralizes energy production helping to provide local resilience in times of centralized outages;

- 6) environmental and social benefits - Solar helps improve local air and water quality and reduce pollution like coal ash and greenhouse gas emissions;
- 7) reduced public health threats - Kentucky has one of the highest asthma rates, which is directly connected to air pollution. By reducing air pollution, solar improves public health; and
- 8) job creation and economic development - Solar energy is one of the fastest growing industries in the United States, now employing more than 260,000 workers nationwide. As solar still makes up less than 0.1% of Kentucky's energy mix, it has enormous growth potential in every region of the Commonwealth.

The PSC should consider these benefits when determining the value of solar.

In states like Minnesota (Farrell, Institute For Local Self-Reliance, 2014) and Maine (Norris, Gruenhagen, Grace, Yuen, Perez, and Rábago 2015), studies commissioned by state Public Utility Commissions have found that distributed solar generation is worth more than its retail price and that the benefits of distributed solar energy consistently outweigh the costs.

The utility argument that rooftop solar customers are not paying their fair share for upkeep to the energy grid is flawed. An analysis of Kentucky utility data reveals that, at most, net metering costs the average ratepayer less than one penny per month (Kentucky Resources Council 2018). A study by the US Department of Energy concluded in 2017 that distributed solar would have a negligible impact on rates until solar reaches 10% or more of a utility's peak demand (Galen, Department of Energy, 2017). In Kentucky, we are far from that 10% mark—much less than 1% of Kentucky's energy mix currently comes from distributed solar.

Solar is working for all Kentuckians under the current net metering law. Non-profits, community centers, churches, and small businesses all benefit from rooftop solar energy in Kentucky. Thank you for your consideration.

Sincerely,

Kenny Stancil

6769 Mount Pleasant Rd
Ewing, KY 41039-7840

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

I understand that the Kentucky Public Service Commission is interested in input about how to implement the 2019 Net Metering Act. As a life-long Kentuckian I recommend that you look at this from all perspectives. Distributed solar energy provides benefits to all Kentuckians--individual Kentuckians who make up small and large businesses, teachers/educators, the un-and under employed, miners, healthcare consumers and providers, etc, etc.

Knowing that Kentuckians had a net metering option for rooftop solar customers, I was pleased that Kentucky was moving in a positive direction as we of necessity move from reliance on fossil fuels to sustainable energy sources. So I was discouraged by the actions of our legislature. Now you, the KY PSC, have an important role in keeping us moving in the right direction, knowing that the current net metering law was working well. Individuals, non-profit groups, community centers, and small businesses were all benefiting from rooftop solar.

To maintain that benefit, the PSC should keep the administrative process simple and low cost as it has been to date. Think about the cost of a new administrative process compared to the overall impact net metering has proven to have on customers.

In addition, solar needs to be supported as part of a group of sustainable sources of energy that we need to implement to help stave off the ever more obvious hazards of climate change. Although coal has been mined in Kentucky for a long time, we need to recognize the negative impact that has had. Coal mine owners made huge profits while the miners suffered health effects that shorten their lifespan and decreases their quality of life in a major way. Changing our energy source can increase the health of Kentuckians while decreasing the cost of healthcare related to threats to public health.

While the utilities claim that rooftop solar customers do not pay their fair share, this has been debunked by several studies. In addition to the cost for individuals to install rooftop solar, the utilities benefit from the use of excess energy during peak hours. And the more rooftop solar we have, the smaller the grid that the utilities

need to build and maintain. So think about why the utilities are pulling back from support of net metering. It is not because it is good for Kentucky at large.

Thank you for your consideration.

Sincerely,

Kevin McGee

780 Flat Bottom Rd
Owingsville, KY 40360-8096

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

I am a rural Kentuckian who switched to net-metered home solar in 2017. Since the installation of our system, we have generated the amount of electricity we use annually for our home. Prior to becoming a net-meter member of our local rural electric co-op (Fleming/Mason), I was member purchasing electricity from multiple rural electric co-ops in the different places I have lived in Kentucky since first having my own home beginning in the late 1980s. As a grid-tied member, my household continues to pay the \$15/month minimum bill, plus the environmental surcharge based on monthly KWh usage each month. The misinformation that net-meter customers utilize the grid without paying for it is often included in public comments of those in opposition to a one-for-one net-meter agreement for customers. This is simply false, as net-meter customers continue to pay a monthly bill to remain connected to the grid, even if they generate enough electricity to meet their needs.

Secondly, we live in a state with a history and a present of extensive reliance on coal-fired electricity generation. As the coal industry declines and utilities are required to meet safer environmental standards, home and small business net-meter solar production is one easy way to reach these standards at no cost to the utilities. Power that a utility company does not have to generate that is generated carbon-free at the site of usage and credited at a one-to-one rate is a cost avoidance for the utilities, and therefore, should be embraced as one way to meet energy needs, with no environmental challenge to the utility.

Developing diversified sources of electricity while compensating individual customers and producers fairly will build a future of a grid that is more resilient. Compensating individual and small business customer producers at a one-to-one rate will continue to motivate people to make this substantial investment in their home or business. Not everyone will pursue this option, but fairly compensating

those that do will lead to decreased need for capacity investment and a reduced financial risk for utilities. Individuals and small businesses will not be as quick to make this substantial investment if the return on their investment cannot be predicted. Even with the current one-to-one rate for home solar customers, It will take 15 years for the system at my home to pay for itself. Under the current agreement, individuals and small business owners willing to install solar are assuming the capacity investment and financial risk that would otherwise fall to the utility in order to produce the power for those same customer needs.

Aside from the benefits to utilities, the overall benefit to communities, including job creation and economic development, should not be overlooked. The solar installation industry is thriving in Kentucky and will be severely curtailed by unpredictability in the rate agreement going forward. As the coal industry goes through a major decline, job creation in a new and sustainable industry is crucial.

As the PSC contemplates rate changes, the process should be transparent and all inclusive. Everyone from individual customers, small business owners, community agencies, non-profits, schools, etc. should have an opportunity to provide input and be invited to participate in the process. A process that includes big businesses, industrial investors, and utility companies without giving equal consideration to others, as happened at the end of 2018 with the KU/LG&E proposed rate hike, will serve only those who are represented.

Thank you for your consideration.

Carmen Rogers
Owingsville, KY

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

3411 Goose Creek Rd
Louisville, KY 40241-2543

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

I have an existing rooftop solar installation, subject to the grandfather provision of SB100, and therefore am not writing for personal economic reasons. I firmly believe that the PSC and Kentucky as a whole should be doing everything possible to encourage the transition to renewable energy in the face of the climate crisis and the market-driven decline of the coal industry.

I believe that solar power users should pay their fair share of the cost of maintaining the grid and I encourage you to require utilities to provide detailed and accurate analysis of those costs on a per-user basis and to determine to what extent they are already being covered by the fixed charges which we are billed and which have recently been increased. Studies have shown that additional costs to other ratepayers are not significant below 10% solar penetration, or are at most a few cents per month.

In addition, please consider the benefits of distributed solar, both monetary and other. Distributed solar lowers peak demand and thereby allows the utility to lessen the need for peak generating capacity or the purchase of expensive peak power. We can hope or presume that such savings are reflected in electric rates, not simply shareholder profits.

Thank you for your consideration.

Sincerely,

George Perkins

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

6769 Mount Pleasant Rd
Ewing, KY 41039-7840

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Net metering, until recently, encouraged the growth of solar energy use, and with that helped create jobs while simultaneously decreasing our negative impact on the environment. Kentucky is way behind in terms of taking advantage of solar energy, and with climate change as bad as it is, we have to wake up and be proactively working to make it better.

Thank you for your consideration.

Sincerely,

Jen O'Daniel

4789 Willman Way
Lexington, KY 40509-2537

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you move forward to implement the 2019 Net Metering Act, you must consider the numerous and significant benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

I personally lobbied the General Assembly as SB 100 was considered and I was shocked by how little understanding proponents of the bill had of the current functioning of net metering and rooftop solar.

The utility argument that rooftop solar customers are not paying their fair share for upkeep to the energy grid was shared frequently and is fundamentally flawed. An analysis of Kentucky utility data reveals that, at most, net metering costs the average ratepayer less than one penny per month (Kentucky Resources Council 2018).

A study by the US Department of Energy concluded in 2017 that distributed solar would have a negligible impact on rates until solar reaches 10% or more of a utility's peak demand (Galen, Department of Energy, 2017). In Kentucky, far less than 1% of Kentucky's energy mix currently comes from distributed solar. A study commissioned by the Maine Public Utility Commission in 2015 put a value of \$0.33 per kWh on energy generated by distributed solar, compared to the average retail price of \$0.13 per kWh — the rate at which electricity is sold to residential customers as well as the rate at which distributed solar is compensated. The study concludes that solar power provides a substantial public benefit because it reduces electricity prices due to the displacement of more expensive power sources, reduces air and climate pollution, reduces costs for the electric grid system, reduces the need to build more power plants to meet peak demand, stabilizes prices, and promotes energy security. These avoided costs represent a net benefit for non-solar ratepayers.

Your valuation of the cost of net metering should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. The benefits of solar offer to the energy grid, and to Kentucky, include

avoided energy costs, reduced line losses, avoided investment in new capacity, reduced financial risks from volatile fuel sources, increased grid resiliency, environmental and social benefits, reduced public health threats, and job creation and economic development.

Given these benefits, and your charged duty to serve the public, I encourage you to prioritize the support and development of distributed solar power production by developing fair net metering rules and rates moving forward.

Sincerely,

Aaron Viles

129 Serenity Way
Berea, KY 40403-8020

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

Dear Public Service Commission,

There are two and only two sources of energy on earth. First is the heat generated by radioactive decay. This is the power source utilized by nuclear power plants. The hazards of this way of producing electricity are well known. The second source is the sun and the most efficient and ecological way of harvesting electricity from sunlight is by using electricity-producing solar panels and from wind mills or from ocean wave energy collectors. The dirtiest way to harvest solar power is by releasing the CO2 and other sequestered greenhouse gasses through the burning of oil, gas, coal and wood.

If you are a climate change denier, you choose to ignore the available science or are so invested in being part of a group of fellow deniers who so choose ignorance that the health of your children and grandchildren is of no importance to you. No argument from science would then persuade you.

In any case, you should be aware that net metering costs of those who supplement their energy needs with photovoltaic panels on their dwelling is less than one penny per month. Indeed, structures owned by so many public, private and religious organizations with operating solar panels show so great gains that efficacy of their investments are obvious.

I have lived in Kentucky for the past 22 years and am tired of hearing comments from out-of-state friends and relatives which refer to the Commonwealth of Kentucky as backward thinking and willfully ignorant of evidence-based offers of improvement on a number of fronts.

I hope that you will consider my comments carefully.

Sincerely,

Jeffrey Hutton

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

4324 Dover Rd
Louisville, KY 40216-3530

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Electric utilities argue that they have fixed costs, and the only cost to them that is reduced by 'customer-generators' is the variable instantaneous cost of generating electricity at 60 Hertz and standard voltages, which they present as mostly the cost of fossil fuel for operating the generating plants. This formulation is largely nonsense, because all costs associated with the operation of electric grid are variable over the planning period of 20 years which is used in the Integrated Resource Planning process. Generation equipment, transmission equipment, distribution equipment, emission control equipment, and coal ash landfills all need maintenance, overhaul, and/or replacement during a 20 year timeframe.

But solar photovoltaic panels are typically expected to last 40 years, substantially longer than most parts of the electric grid and the equipment operated by utility companies. (PV modules are warranted by their manufacturers to last at least 25 years). To proclaim that the output of solar systems is to be considered a variable cost when they have a life expectancy of 40 years, but the fabric filters in the pulse-jet particulate filtering systems at KY coal power plants are a fixed cost, when we know they will fail within a timespan of hours after a defined number of pulses - this labeling seems like just ridiculous politicians spin.

A large part of the difference between utility funded studies and independent or PSC studies is due to what benefits are considered. Evaluation of the cost and benefits of net metering and distributed generation should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. The benefits which distributed generation solar offers to the energy grid, and to Kentucky's wider society, include avoided energy costs, reduced line losses, avoided investment in new capacity, reduced financial risks from volatile fuel sources, increased grid resiliency, environmental and social benefits, reduced public

health threats, and job creation and economic development. The PSC should consider all these benefits when determining the value of solar and distributed generation.

The argument by electric utilities that solar customers do not contribute fairly to the costs of the grid is flawed. It seems to use the same logic as "A customer who goes on vacation is a cost to the utility, because they don't pay as much that month." A study by the US Department of Energy concluded in 2017 that distributed solar would have a negligible impact on rates until solar reaches 10% or more of a utility's peak demand (Galen, Department of Energy, 2017). In Kentucky, we are quite far from that 10% mark—substantially under 1% of Kentucky's electric energy mix currently comes from distributed solar.

Further, the existing 1% cap on the growth of net metering already limits any potential impacts of net metering.

Adjudication by the PSC will only produce a result which optimizes Kentucky's economic growth and most vibrant economy if the full range of benefits enumerated above for all customers and Kentucky citizens are fully considered, and brought in to the calculations in a quantitative way. It will be a mistake, and basically unfair, to only consider very short-term costs to electricity retailers for providing electricity to 'customer-generators' without considering the longer term savings from avoided generation investment costs, the broad environmental and social benefits, the improved public health, and the economic development benefits that increased use of distributed solar generation can bring.

Thank you for your consideration.

Sincerely,

Wallace McMullen

4020 Casey St
Morning View, KY 41063-9701

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Thank you for your consideration.

Sincerely,

Tom Cason

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

10 Adele Pl
Frankfort, KY 40601-2714

10/13/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

With regard to the 2019 Net Metering Act, I want to say that I believe the current net metering law is working well for Kentuckians.

It seems clear that we are going to have to move increasingly to renewable energy like solar as we deal with a warming climate and a decline in coal production. Net metering in its current form is a factor people consider when they decide whether or not to install solar systems. I have been saving up with the hope of installing solar sometime in the next few years. I was disheartened to hear about the proposed changes to net metering. Changing this system will discourage people from investing in solar which will impact the small but growing solar industry in the state and put Kentucky at a disadvantage when it comes to developing the skills and talent needed to support the green economy.

Please leave the current net metering laws in place.

Sincerely,

Shauna Dunham

752 Kirkland Dr
Lexington, KY 40502-3361

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

Sirs and Ladies who decide Kentucky's future: It is obvious how important you are to all citizens of the Commonwealth. Our children especially need your wisdom to allow Kentucky to perform at its best. Retarding Greenhouse gases shows the kind of respect our children need to move our state and country in the right direction to conserve their environment. Every step matters no matter how small; it is a step for the health and betterment of our children. I spent a lot of money to make an example in my neighborhood for all to see that solar power is here. Not as politicians but as parents and grandparents, we need for you to shun the greed that is taking over politicians and speak out for all Kentuckians that our environment is connected to the health of all in our state. Examples to preserve us and educate our students is in your hands. Please push solar energy forward now when it has a chance to make a difference for generations to come.

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more. Please make the incentives to use solar power match or exceed the goals of a healthy and clean environment for all of us.

Thank you

Professor, Doctor, KY thoroughbred owner, TAX-PAYER, Solar energy user and a Kentuckian (Kentucky Colonel)

Rick Greenberg

990 Hanly Ln
Frankfort, KY 40601-9286

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Residents of the Commonwealth should have a say in how their energy dollars are used in their own households. The premise of our country has allowed each person to do what is necessary to eliminate waste in their households. Solar energy will allow our fellow Kentuckians to budget their households to put their wages to better use, such as rising health cost for everyone. Please let each of us make the decision to put our dollars where they are needed and not in the pockets of big power conglomerates.

Thank you for your consideration.

Sincerely,

Nancy Parker

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

892 Lawson Ln
Willisburg, KY 40078-8150

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

My family installed solar on our home this year. We invested 24000 to do so, and we are not wealthy by any means. But we felt strongly that we needed to live according to our values, and our values tell us that renewable energy is the way to go, and it will be our future. The science is very clear that we can make choices that allow us as a species to be sustained, and maintain a decent quality of life, and switching to renewables is one of those choices. We understand that economic sustainable is also vital, but again the evidence is clear. Renewable energy industry is great for jobs and for reducing our dependency on foreign oil. That is an argument conservatives should get behind!!

The challenge is, how do we evolve the current grid? It needs upgrading, to be sure, but individuals and businesses need incentives to change. The certainty in net metering as it is now, provides that incentive. To take it away, as this latest bill has done, takes away incentive. It is a shame that kentucky is on the wrong side of history, of health, of good economics, and of a sustained environment, by disincentivizing the switch to solar. There is no reason in the world not to support energy industry employees by transitioning them into renewables.

Please act to improve the incentive and the certainty in net metering rates in the future, as you implement the Net Metering Act. We love our rural Kentucky paradise and hope and pray daily that our leaders act in a way that preserves it for the health of future generations.

Sincerely,

Anne Harrison

6769 Mount Pleasant Rd
Ewing, KY 41039-7840

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OCT 15 2019

10/14/19

PUBLIC SERVICE
COMMISSION

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more. Specifically....

Evaluation of the cost of net metering should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. The benefits of solar offer to the energy grid, and to Kentucky, include avoided energy costs, reduced line losses, avoided investment in new capacity, reduced financial risks from volatile fuel sources, increased grid resiliency, environmental and social benefits, reduced public health threats, and job creation and economic development. The PSC should consider these benefits when determining the value of solar.

In states like Minnesota (Farrell, Institute For Local Self-Reliance, 2014) and Maine (Norris, Gruenhagen, Grace, Yuen, Perez, and Rábago 2015), studies commissioned by state Public Utility Commissions have found that distributed solar generation is worth more than its retail price and that the benefits of distributed solar energy consistently outweigh the costs.

The utility argument that rooftop solar customers are not paying their fair share for upkeep to the energy grid is flawed. An analysis of Kentucky utility data reveals that, at most, net metering costs the average ratepayer less than one penny per month (Kentucky Resources Council 2018). A study by the US Department of Energy concluded in 2017 that distributed solar would have a negligible impact on rates until solar reaches 10% or more of a utility's peak demand (Galen, Department of Energy, 2017). In Kentucky, we are far from that 10% mark—much less than 1% of Kentucky's energy mix currently comes from distributed solar.

Solar is working for all Kentuckians under the current net metering law. Non-profits, community centers, churches, and small businesses all benefit from rooftop solar energy in Kentucky. Some examples include: the Post Medical Clinic in Mount

Sterling, the Catholic Action Center in Lexington, People's Self-Help Housing in Lewis County, and the Campton Baptist Church in Wolfe County.

PSC should support the right of solar industry, consumers, low-income, and environmental advocates to intervene in future PSC rate cases, including rate cases regarding solar net metering. In late 2018, the Public Service Commission blocked the right of low-income advocates and environmental groups to intervene in a rate case to decide on a proposed rate hike for KU/LG&E customers—while allowing industrial intervenors like Kroger and Walmart. This is an issue of special interest to many stakeholders, each of which bring important perspectives to the issue and will be significantly affected by the PSC's decisions. With a new Attorney General taking office in 2020, there is no way to know what position they will take on these issues; it would be unreasonable to assume the AG will represent these diverse interests; and these parties will have relevant expertise which the new AG may not have.

Evidence-based, transparent process required. Changes to net metering must be based on evidence of impacts to the utility and other ratepayers. Evidence should be open to public review and analysis.

Thank you for your consideration.

Sincerely,

KEEGAN MCGEE

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

3275 Gondola Dr
Lexington, KY 40513-1065

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

What a travesty of common sense. Solar technology is finally coming of age, and yet we in KY want to preserve the old way of doing things, even when they are inferior. Consider the benefits of *distributed* and *clean* energy. Coupled with rapidly developing battery technology, the long term benefits are staggering. The grid will be more flexible, easier to upgrade and maintain, and at the same time, less necessary. To pull the rug out from under individual Kentuckians that have invested in their own energy supply, which also benefits the state and country as a whole, is simply un-American.

I have identified as a Republican, but in the next election cycle you can count on me voting for leaders that look forward rather than backward. It makes zero sense for our state and country to make good, positive choices more expensive, for no other reason than to benefit the status quo. That is what this net-metering change is doing.

Come to your senses.

Sincerely,

Jason Neiser

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

4785 Ridge Creek Rd
Owensboro, KY 42303-7816

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

I am very disappointed in the legislatures decision. I hope you will protect the growing solar industry in KY. I had planned to add solar panels to my house because I have the land to do so. I was even considering adding Telsa Power packs to power my house when the utility grid goes down. All of that is now been put on hold until the PSC makes final decisions on this process. I beg you to support Kentuckians and give them the right to choose solar without being penalized by added fees from utility companies.

Thank you for your consideration.

Sincerely,

John Phillips

147 Barrett Ln
Berea, KY 40403-9608

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to (re)consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more. Solar is not only the future with regard to clean and renewable energy but increasingly being utilized in a growing number of states, with many statistics and in-depth reports documenting its enormous and diverse benefits. I've lived in various states of the US and several European countries, and while I have liked living in Kentucky in many ways and know its issues well, I have been disappointed in the way politicizing no-brainer development strategies has seemed to be much more important to many of its political leaders than what is best, right, and (to quote Mr. Spock) 'logical' for our 'common-wealth' and well-being.

The previous governors of both Nevada and Florida (the latter absurdly ordering that the term 'climate change' never be used on any state written document or other official communication) opposed what was clearly best for the people of that state in favor of what Big Energy donors paid them well to promote. In the former case, a huge solar energy company providing many jobs left the state, and in the latter the governor was voted out of office as Florida works hard to catch up with some sort of effective action to combat its exponentially eroding coastlines. This same dysfunction is of course being grappled with at the national level as well. Kentucky's recently changed laws by the Legislature to penalize solar energy businesses AND consumers in favor of handouts to politicians is the same ol', same ol' that has plagued this state for so long. Unfortunately, EVERYONE will suffer from this self-aggrandizing behavior as has been hideously the case with coal-mining, and as the tide continues turning across the country, those acting in this shameful way will eventually find themselves sharing Governor Sanford's fate.

I hope you will look, and encourage your colleagues look, honestly at the science and at what is ethically right and LEAD on this issue that is so urgently important to the future of all of us.

Thank you!

Theresa Scherf

14 Church St
Whitesburg, KY 41858-7252

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

I am an eastern Kentucky resident writing you with concerns about how solar energy will be valued in our state. People in this part of the state are suffering hard times with the down turn in the coal industry. Many have spoken out at PSC hearings about how electricity rate increases will force them to chose between having food to eat or staying warm. People from our community centers, where residents get all kinds of services, say they will have to close their doors if there are no alternatives to reducing their power bills.

Rooftop solar power, with a fair rate for net metering, does provide an alternative means for organizations, businesses, churches and individuals to control their energy costs while providing energy back into the system to be used by other customers. And in eastern Kentucky solar installation companies have been a bright spot for new job creation in an otherwise dark picture. Solar is working for all Kentuckians under the current net metering law that offers a 1:1 ratio.

As you make your determination, evaluation of the cost of net metering should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. The benefits that solar offers to the energy grid, and to Kentucky, include avoided energy costs, reduced line losses, avoided investment in new capacity, reduced financial risks from volatile fuel sources, increased grid resiliency, environmental and social benefits, reduced public health threats, and job creation and economic development. The PSC should consider all of these benefits when determining the value of solar.

Thank you for your consideration.

Sincerely,

Amelia Pickering

423 Marsailles Rd
Versailles, KY 40383-1673

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

The proposed legislation and implementation is neither pro-business or pro-growth. It may be pro-established utilities, but that is not the same as being effective utility or economic development strategy.

Sincerely,

Dr. David L. Arnold

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

1000 Rain Ct
Lexington, KY 40515-1017

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge the PSC to consider the true cost of net metering's fair share for upkeep to the energy grid.

- 1) **FAIR SHARE TRUE COST:** The utilities' argument that net metering isn't paying its fair share is flawed; if for no other reason that the utilities have never shared their analysis leading to that conclusion. In the absence of that key documentation, an analysis of Kentucky utility data reveals that, at most, net metering costs the average ratepayer less than one penny per month (Kentucky Resources Council 2018). A study by the US Department of Energy concluded in 2017 that distributed solar would have a negligible impact on rates until solar reaches 10% or more of a utility's peak demand (Galen, Department of Energy, 2017). In Kentucky, we are staggeringly below the 10% mark -- less than 1% of Kentucky's energy mix currently comes from distributed solar.

If utilities are going to ask for a charge greater than one penny per month, they must be required to share their analysis justifying a higher charge. Its only fair.

- 2) **ALL STAKEHOLDERS INPUT:** Also, it is essential that the PSC permit solar industry, consumers, low-income, and environmental advocates to intervene in future PSC rate cases, including rate cases regarding solar net metering. It is only fair and equitable that like other stakeholders, these interests be permitted to express their concerns that could be significantly affected by PSC's decisions. With the Attorney General an elected office, there is no way to know what position they will take on these issues at any given time. It is unreasonable to assume that the AG will always represent these diverse interests. And importantly too, these interested parties will very likely have relevant expertise which the new AG may not have.

Thank you for your consideration.

Sincerely,

Henry Jackson

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

4715 Southern Pkwy
Louisville, KY 40214-1424

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Thank you for your consideration.

Sincerely,

Anthony Sweazy

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

4536 S 6th St
Louisville, KY 40214-1404

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

We installed 22 solar panels on our home in south Louisville in 2015, and have generated far more electricity than we use. LG&E is getting free electricity from us, which helps our neighbors during peak hours and lessens the need for the use of fossil fuels. We strongly recommend continuing with 1:1 credit for household solar in order to encourage more people to install solar, create clean energy jobs, and mitigate climate change.

Thank you for your consideration.

Sincerely,

Claire Williams

RECEIVED

1108 Abbeywood Rd
Louisville, KY 40222-4402

OCT 15 2019

10/14/19

PUBLIC SERVICE
COMMISSION

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Evaluation of the cost of net metering should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society. In states like Minnesota (Farrell, Institute For Local Self-Reliance, 2014) and Maine (Norris, Gruenhagen, Grace, Yuen, Perez, and Rábago 2015), studies commissioned by state Public Utility Commissions have found that distributed solar generation is worth more than its retail price and that the benefits of distributed solar energy consistently outweigh the costs.

The benefits of solar offer to the energy grid, and to Kentucky, include avoided energy costs, reduced line losses, avoided investment in new capacity, reduced financial risks from volatile fuel sources, increased grid resiliency, environmental and social benefits, reduced public health threats, and job creation and economic development. The PSC should consider these benefits when determining the value of solar.

Solar is working for all Kentuckians under the current net metering law. Non-profits, community centers, churches, and small businesses all benefit from rooftop solar energy in Kentucky. Some examples include: the Post Medical Clinic in Mount Sterling, the Catholic Action Center in Lexington, People's Self-Help Housing in Lewis County, and the Campton Baptist Church in Wolfe County.

PSC should support the right of solar industry, consumers, low-income, and environmental advocates to intervene in future PSC rate cases, including rate cases regarding solar net metering. In late 2018, the Public Service Commission blocked the right of low-income advocates and environmental groups to intervene in a rate case to decide on a proposed rate hike for KU/LG&E customers—while allowing industrial intervenors to participate. Industry is just one of many stakeholders. This

is an issue of special interest to many stakeholders, each of which bring important perspectives to the issue and will be significantly affected by the PSC's decisions. With a new Attorney General taking office in 2020, there is no way to know what position they will take on these issues; it would be unreasonable to assume the AG will represent these diverse interests; and these parties will have relevant expertise which the new AG may not have.

Thank you for your consideration.

Sincerely,

Suzanne DeGregorio

440 Lutes Ln
Coxs Creek, KY 40013-7411

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more. Specifically....

The utility argument that rooftop solar customers are not paying their fair share for upkeep to the energy grid is flawed. An analysis of Kentucky utility data reveals that, at most, net metering costs the average ratepayer less than one penny per month (Kentucky Resources Council 2018). A study by the US Department of Energy concluded in 2017 that distributed solar would have a negligible impact on rates until solar reaches 10% or more of a utility's peak demand (Galen, Department of Energy, 2017). In Kentucky, we are far from that 10% mark—much less than 1% of Kentucky's energy mix currently comes from distributed solar.

Solar is working for all Kentuckians under the current net metering law. Non-profits, community centers, churches, and small businesses all benefit from rooftop solar energy in Kentucky. Some examples include: the Post Medical Clinic in Mount Sterling, the Catholic Action Center in Lexington, People's Self-Help Housing in Lewis County, and the Campton Baptist Church in Wolfe County.

Thank you for your consideration.

Rebecca Geracitano

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

13 Fairway Dr
Berea, KY 40403-1708

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Thank you for your consideration.

Sincerely,

Lawrence Mehler

870 Horan Ln
Springfield, KY 40069-8911

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

RECEIVED

OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

You are about to consider how to best implement the 2019 Net Metering Act. Please think of the benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools. There is plenty of room on our energy grid for this alternative method. Most people who CAN afford it, are trying to reduce demands on fossil fuel sources and augment their savings , even if just a little.

I hope you will eventually opt for large solar fields or solar panels on buildings where you, yourselves can provide this kind of energy directly to any or all customers. If I knew that my energy was from the sun, and not from fossil polluting fuels, I wouldn't feel the need to install any panels! I think you might get ahead of the game and help those of us who are trying to do our best to create a better, CLEANER, more modern world to leave our children.

Thank you for your consideration.

Most sincerely,

Lana Gits

314 MADISON St
Berea, KY 40404-0001

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

As you consider how to best implement the 2019 Net Metering Act, I urge you to consider the many benefits that distributed solar energy provides to individual Kentuckians, businesses, churches, farms, and schools; to our energy grid; and to public health, economic development, climate protection, and more.

Specifically, I ask that you to look at how these individuals can give back to the their communities through the rooftop solar systems. By giving them fair credit, you can build up community members who care not only for the environment but for the people that they live alongside. I hope that you also feel the need for community action and will recognize the work of all those bettering our world.

Thank you for your consideration.

Sincerely,

Emily Smith

5150 Devils Hollow Rd
Frankfort, KY 40601-7709

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

I would like to see hindering legislation repealed so that solar energy can soar in the Commonwealth. Solar can bring jobs to our state as well as making Kentucky a GREEN place to live! I would love to add solar to my home, but not if there is no financial benefit. We need net-metering, so that if the panels on my roof produce more energy than I need, the local cooperative can buy it or trade for it. It is unbelievable that lobbying could set back the Kentucky in the ways that would make solar energy impossible or not worth the investment. Please, consider this very carefully so that Kentucky can move forward in the area of solar energy.

Sincerely,

Ida Palmer-Ball

5326 Paris Pike
Georgetown, KY 40324-9615

10/14/19

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Written Comments on PSC Case Number 2019-00256

To Whom It May Concern:

The PSC should consider the many unfair competitive advantages granted to big utilities before implementing the 2019 Net Metering Act. Independent solar entrepreneurs have worked hard to establish interest in solar for more than a decade to the benefit of consumers and the environment and without having had a territorial monopoly position, ancient easements to access customer properties to cut down their trees or permissions to erect ugly fixtures along roadways, etc.. Net metering customers, even if they bury all their solar wiring as I have, or go totally off grid, must still permit ugly poles and wires crisscrossing their private properties and roadways, not to mention suffer the effects of coal plant emissions. They are not compensated for these permissions.

Now that solar is cost competitive and the public is interested the utilities have used hundreds of thousands of dollars in political donations to grease the passage of the new law and displace a law which was supposed to run until total net metered electrical production reached 1% (currently it's around 0.1%). The new law, unless addressed in a simple and fair way, will cost consumers a lot more than the tiny number of net metering installations in the state will cost. It ensures a bureaucratic new process funded by tax payers and decreased choice for consumers. When a similar law was enacted in Nevada the state lost its independent solar business and thousands of jobs. A few years later the work of the Environmental Defense Fund and a state referendum resulted in restoration of prior policies but by that time many solar entrepreneurs had been bankrupted.

The other day I met with state officials hoping that they could compete with nearby states for new technology investments. I hope that all entrepreneurs and investors will consider the process by which our legislature enacted the 2019 Net Metering Act and its outcome before starting new ventures. It is too late to change the law but you can ensure a fair outcome.

Thank you for your consideration.

Sincerely,
Frances Lockwood

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

153 Penmoken Park
Lexington, KY 40503

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Written Comments on PSC Case Number 2019-00256

Dear Commissioners,

As you contemplate how to implement the 2019 Net Metering Act, I urge you to consider the following:

As SB 100 was passing, you commissioners wrote a letter to the Kentucky General Assembly, assuring our legislators that you had "broad authority to consider... evidence of the quantifiable benefits and costs of a net-metered system." I ask you now to stand by that commitment you made, and to truly consider a comprehensive cost-benefit analysis of the impact of net metering as you decide on this rate case.

Given that meta-analyses of value of solar studies from different states¹ have shown that net metering more often than not provides a net benefit to ratepayers, PSC must examine the benefits of grid-tied solar, rather than just the costs. This analysis should be grounded in verifiable data, in the inclusion of *all* relevant stakeholders, and in the involvement of objective and trusted third-party evaluation of methodologies and data.

It is crucial to keep in mind that the utility argument regarding cost-shifting distorts the truth and is not founded in fact. Cost-shifting is negligible at current rates of penetration, and current law prevents more substantial cost-shifting by capping net metering when solar becomes 1% of Kentucky's energy production.

An analysis of 2016 Kentucky utility data shows that net metering costs the average ratepayer less than one penny per month², but utilities would benefit tremendously if rooftop solar were suddenly out of reach for most Kentuckians. The Commission must protect us from the utility interests to monopolize control over the renewable energy in Kentucky—by setting a just and reasonable rate that consider the many benefits that distributed solar provides to our state. I encourage the Commission to

¹ ICF (20 18) Review of Recent Cost-Benefit Studies Related to Net Metering and Distributed Solar, and Weissman and Fanshaw (2016) Shining Rewards: The value of rooftop solar for consumers and society.

² *The Economic Impact On Kentucky Residential Customers Of Energy "Sold" To Utilities From Net Metering Solar Customers in 2016*, Kentucky Resources Council, February 28, 2018

consider a value of solar that is comprehensive and takes into account all that distributed solar can do to contribute to the public interest of everyday Kentuckians.

In addition to avoiding energy and infrastructure costs for utilities, reducing risks for ratepayers, reduced line losses, and increased grid resiliency, I particularly urge the Commission to consider the what distributed generation in Kentucky does to help reduce pollution and, by extension, improve public health. Distributed solar also creates thousands of safe, good-paying jobs to Kentucky communities. According to the American Council for an Energy Efficient Economy, clean energy jobs are more likely to be open to workers without special credentials, and they are more likely to pay those workers above average wages than jobs in the fossil fuel sector. Lastly, solar generation reduces our carbon emissions and allows everyday Kentuckians to contribute to meaningful climate action.

Another component of a fair, transparent process is the inclusion of all voices in the process. The PSC should and must support the right of all entities to intervene in future PSC rate cases, including rate cases regarding solar net metering. The AG's office is unable to provide the same perspective of these advocates to a rate case, and it should be the right of all relevant parties to participate in the process. Beyond a fair intervention process, the PSC should ensure that the process for both intervention and public feedback is accessible, through the provision of adequate time and opportunity for comment periods; opportunities for regionally-based public hearings outside of Frankfort; and the equal weight of both emailed-in and paper comments in future public comment periods.

Thank you for your consideration.

Nikita Perumal

Kentuckians For The Commonwealth



RÁBAGO ENERGY LLC
2025 E. 24th Avenue, Denver, Colorado 80205
TEL 512.968.7543 eMail karl@rabagoenergy.com
Web www.rabagoenergy.com

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

October 15, 2019

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

RE: Case No. 2019-000256, Implementation of the Net Metering Act

Dear Commissioners:

Kentuckians for the Commonwealth (“KFTC”) and Mountain Association for Community Economic Development (“MACED”) appreciate the opportunity to submit comments in this proceeding relating to the Commission’s implementation of the Net Metering Act.

KFTC and MACED are two organizations working for several decades for a better quality of life for Kentuckians and to support just and reasonable rates and fair opportunities for individuals, households, local governments and enterprises (both for-profit and not-for-profit) to take advantage of and personally invest in distributed solar photovoltaic [“solar PV”] electricity systems to help manage their electricity bills.

We request your consideration of the attached comments, and an opportunity to participate in the upcoming public hearing on this matter.

Sincerely,

Karl R. Rábago
Rábago Energy LLC
On behalf of KFTC & MACED

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OCT 15 2019

PUBLIC SERVICE
COMMISSION

Andy McDonald
7134 Owenton Rd.,
Frankfort, KY 40601

Email: [REDACTED]

October 15, 2019

Kentucky Public Service Commission
211 Sower Boulevard, Post Office Box 615
Frankfort, Kentucky, 40602-0615

Comments Regarding PSC Case Number 2019-00256

Dear Commission,

I am a customer of Kentucky Utilities and a net metering customer-generator with a 2 kilowatt solar PV system which has supplied nearly all of our home's net-annual electricity needs since being installed in 2011. I have also worked in the solar energy field in Kentucky since 2004, serving multiple roles, including public education, policy advocacy, solar energy system design, installation, and consulting. I currently work as the Director of the Sustainable Systems Program for Earth Tools Inc. in Frankfort, Kentucky, where I continue to provide consulting, educational, and policy research services related to energy and sustainability.

I have been engaged with the topic of net metering since I started working with Appalachia – Science in the Public Interest (ASPI) and the Kentucky Solar Partnership (KSP) in 2004. ASPI and KSP played a central role in the development of net metering in Kentucky, hosting the first pilot net metering system at their facilities in Mt. Vernon and working with Kentucky Utilities to develop this pilot project. They then worked closely with utilities and legislators to develop Kentucky's original net metering statute in 2004. I joined the organization just as the net metering law was passed in 2004 and was involved in 2008 when the law was revised. I then participated in the development of Kentucky's Interconnection and Net Metering Guidelines, published in January 2009.

Net metering has been a foundational policy enabling the establishment of a solar photovoltaic (PV) industry in the United States and has been essential to the development of a solar industry in Kentucky. It has the virtues of being simple, clear, predictable, and

consistent; qualities that have been supported by the state's Interconnection and Net Metering Guidelines, which established uniform policies and procedures across all regulated utilities in Kentucky. These features have enabled customers with interest in using solar to more easily learn how the process works and what the financial benefits would be for a solar investment. The predictability of net metering has enabled customers to make long-term financial investments in PV systems, with very reliable returns on investment. This has enabled solar businesses to grow and develop a market for this technology.

Net metering has the additional virtue of being a very low-cost policy to implement. There are a suite of policies that can be implemented to promote new technologies and renewable energy, many of which require direct government investment (e.g. Investment Tax Credits, public benefit funds, grant programs). Net metering is different. It requires no taxpayer investment and has a negligible financial impact on utilities and ratepayers, at least during the early stages of market development (when the penetration of distributed solar is a small percent of a utilities peak load).¹ Kentucky continues to be in this early stage, with the total installed capacity of net metering amounting to about 0.05% of the state's peak demand.²

As a policy which has been essential for people to economically produce their own power, to make investments to control their long-term energy costs, and to protect themselves against future rate increases; and as a policy which is central to the success of Kentucky's small solar businesses, I am very concerned with how SB100 will be implemented by the PSC. There is a legitimate risk of ending a policy that works well in order to solve a problem which does not exist; and of spending more money to "fix the problem" than is gained by the "solution."

I therefore urge the Commission to take the time to establish an open process for investigating this issue in its full complexity before accepting any utility rate cases to implement the changes addressed in SB100. The question of the value of distributed generation and net metering has been studied extensively in many jurisdictions of the United States and merits careful consideration in the Kentucky context. While each utility has unique characteristics that pertain to the cost/benefit analysis of distributed generation, there are a host of common issues relevant to all utilities and how this cost/benefit analysis is conducted. A single initial administrative case to investigate these issues and establish a common methodology for determining the value of net metering generation would be the

¹ "Putting the Potential Rate Impacts of Distributed Solar into Context," Galen Barbose, US DOE Lawrence Berkley National Laboratory, January 2017, p.29. See also Comments submitted by Karl Rabago on behalf of MACED and KFTC in KY PSC Case No. 2019-00256, p. 37-38. Rabago's analysis of data reported to the US Energy Information Administration shows that in 2018, net metering may have cost Kentucky utilities about \$75,000, before accounting for any benefits of net metering. This amounts to less than one cent per month per average ratepayer.

² Ibid (Rabago), p.5.

most efficient use of Commission, ratepayer, and stakeholder resources. This would also help to prevent the creation of a mix of policies and approaches unique to different utilities, which would be detrimental to those ratepayers interested in utilizing solar energy and the businesses that serve them.

Regarding the cost/benefit analysis of net metering, I understand that SB100 specifies that utilities are entitled to recover "all costs necessary to serve" their customer-generators, through ratemaking processes governed by the Commission. I ask the Commission to utilize a comprehensive analysis which incorporates the full suite of categories in which cost/benefit impacts can be identified and not allow the utilities to narrow the scope of "costs" to the exclusion of legitimate benefits that provide value to the utility, ratepayers, and society.³ I am encouraged that the Commission has acknowledged their authority to consider these benefits in letters addressed to the Kentucky House and Senate prior to the passage of SB100.⁴

I offer the following additional topics for the Commission's consideration.

1. **Net metering is the critical policy enabling ratepayers to generate their own power and control their energy costs with on-site generation.** The Commission should protect customers' right and ability to produce their own power and make investments to control their energy costs.
2. **Changes to rate designs for net metering customers should be fair and reasonable.** New tariff structures should avoid creating new barriers to solar adoption. Utilities should not be allowed to use rate designs as tools to inhibit the use of net metering or on-site generation.
3. **A comprehensive cost-benefit analysis is needed.** Evaluation of the cost of net metering should be done within a comprehensive cost/benefit analysis, using a standard methodology developed by the Commission. This methodology should include the full range of benefits that net metering and distributed generation provide to the utility, ratepayers, and society.
4. **An evidence-based, transparent process should be required.** Changes to net metering should be based on evidence of impacts to the utility and other ratepayers. Evidence should be open to public review and analysis.
5. **The small scale of Kentucky solar development is a significant factor.** Consideration should be given to how the rate impacts of distributed solar are related to the level of

³ Ibid (Rabago), p. 8-10.

⁴ Letters from KY PSC Commissioners to Representative Jim Gooch, February 14, 2019 and to Senator Brandon Smith, February 18, 2019. Copies included with these comments.

market penetration. Research has shown that in places with very low market penetration (i.e. <1% of utilities' peak demand), like Kentucky, impacts are likely negligible.⁵

6. **A hard cap on the growth of net metering already limits any potential impacts of net metering.** The existence of the 1% cap on growth of net metering is a significant limit to any rate impacts net metering could potentially have.
7. **Complicating the regulatory process is a real cost for solar customers and businesses.** The cost of implementing a more complex administrative process for administering net metering should be considered within the scope of this issue. Currently, administering net metering is simple and low-cost, for the utility and customer. The PSC should consider the cost of a new administrative system (including the cost of litigating the issue in recurring rate cases for all utilities) relative to the overall impact net metering is proven to have on ratepayers. Is the solution more costly than the problem?
8. **Maintaining consistency in the rules and compensation methodology across all utilities is very important for customers and solar industry.** Kentucky has so many utilities that it would be burdensome on the solar industry to cope with rules that vary with every utility. The current law includes standardized interconnection guidelines, which were standardized for the specific purpose of making it easier for customers to use distributed generation.
9. **Clarifying issues for existing customers and for the transition period before the first rate cases are resolved.**
 - a. According to the "grandfathering" clause in SB100, customers whose renewable energy systems are placed in service prior to a utilities' initial rate case revising their net metering rate structure shall remain under the current net metering system for a period of 25 years. The revised statute has created ambiguities regarding this transition period.
 - i. How is "in service" defined?
 - ii. How will system repairs or expansions affect a customer-generator's grandfathering status?
 - iii. I encourage the Commission to clarify these issues and provide customers with a minimum of uncertainty while enabling continued access to net metering. A consistent, fair, and reasonable definition of "in service" is needed so customers can make decisions to invest in solar energy systems with a reasonable expectation of what net metering rates would apply to them. The possibility that the net

⁵ Barbose, p.29.

metering rates will change (and possibly be significantly reduced) between the decision to purchase a PV system and the date it is placed “in service” creates substantial risk of financial loss for customers. Therefore, it would be reasonable to define “in service” based on objective events that are in the customer or solar installer’s control, such as the date a system begins generating power to the grid. An alternative criterion could be the date the PV system passes the local electrical inspection. Defining “in service” according to the date the utility inspects or approves the system would create unreasonable risk and uncertainty for customers, because if the utility delays final approval that could push the “in service” date past the deadline for changeover to the new net metering rates.

10. **For future proceedings concerning net metering, I ask the Commission to provide intervenor status to concerned stakeholders who seek to participate, including the solar industry, consumers, low-income, and environmental advocates.** This is an issue of special interest to many stakeholders, each of which bring important perspectives to the issue and will be significantly affected by the PSC’s decisions.

In closing, I appreciate the Commission opening this proceeding to accept public input on this important matter. I look forward to continuing to engage with the Commission as it works to implement the provisions of SB100.

Sincerely,

Andy McDonald
Director, Sustainable Systems Program,
Earth Tools Inc.
Kentucky Solar Energy Society, Vice Chair
Kentucky Solar Industries Association, Member



Matthew G. Bevin
Governor

Charles G. Snively
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
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Michael J. Schmitt
Chairman

Robert Cicero
Vice Chairman

Talina R. Mathews
Commissioner

February 18, 2019

VIA EMAIL

Senator Brandon Smith
Chair, Natural Resources
and Energy Committee
702 Capital Avenue
Annex Room 252
Frankfort, KY 40601

Re: Senate Bill 100, House Floor Amendment 1

Dear Senator Smith:

Because of the extensive changes to Senate Bill 100 (SB 100) adopted by the House of Representatives in House Floor Amendment 1 (HFA 1), the Public Service Commission is compelled to oppose the bill. As explained in our Feb. 14, 2019 letters to you and Rep. Gooch, the original language in SB 100 would have established a practical approach to addressing a utility's compensation for net-metered systems through the ratemaking process. In its current form, however, SB 100 is fatally flawed.

First, there are the procedural challenges presented by the provision in HFA 1 requiring the establishment of a ratemaking proceeding before the Commission no later than one year from the effective date of the Act. The Commission does not have sufficient staff to adequately conduct concurrent ratemaking proceedings for all retail electric suppliers during such a compressed timeframe. Utilities and the territories they serve have quite distinct differences, and it is because of these variations that the ratemaking process should reflect a utility's unique characteristics and the specific cost of serving that utility's customers. The same holds true for examining the quantifiable benefits and costs of net-metered systems. Attempting to rush the consideration of these issues within an artificially compressed timeframe or trying to force the Commission to address the issue for all electric utilities and customer-generators in one administrative case, as HFA 1 appears to be aimed at doing, is not in the best interests of ratepayers or any other stakeholder.

Second, the Commission has concerns regarding the language describing what the Commission *shall* consider in reviewing a net metering tariff. The Commission has

broad authority to consider all relevant factors presented during a rate proceeding, which would include evidence of the quantifiable benefits and costs of a net-metered system. See *Kentucky Public Service Com'n v. Commonwealth ex rel. Conway*, 324 S.W.3d 373, 383 (Ky. 2010) (The Commission has “plenary authority to regulate and investigate utilities and to ensure that rates charged are fair, just, and reasonable under KRS 278.030 and KRS 278.040.”). Benefits of generation from net-metered systems vary for a number of reasons, including locational benefits, specific utility load factors, etc. Statutory language explicitly dictating *only* what the Commission is to consider in a rate proceeding (as HFA 1 does in Section 2, paragraph 5) is antithetical to standard principles of utility ratemaking.

Third, the Commission questions the rationale behind the provision in HFA 1 mandating that an entity representing solar installer interests be granted intervenor status when the existing statute applies not only to solar systems but also to wind, biomass and hydro energy generating systems as well. This provision seems to indicate that solar installer interests are driving this discussion, perhaps to the detriment of the broader interests of all stakeholders, especially ratepayers. With a few limited exceptions¹, the Attorney General is the only entity granted the statutory right to intervene in proceedings before the Commission. KRS 367.150(8)(b). All other intervention before the Commission is permissive, and granting or denying intervention is within the Commission's discretion. In making its determinations, the Commission considers whether the prospective intervenor (1) has a special interest in the case that is not otherwise adequately represented; or (2) is likely to present issues or to develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. 807 KAR 5:001, Section 4(11)(a). As these factors appropriately assess the need for intervention in a given proceeding, HFA 1's grant of special status to a particular commercial interest is both unusual and unnecessary.²

Finally, that a sentence allowing third-party leased systems is included in an amendment with no discussion of the possible implications highlights the need for more robust discussion. These issues are larger than net metering. As the electric utility sector undergoes significant and rapid changes, more holistic, forward-thinking examination is due. Addressing these complex issues and the positions of competing stakeholder interests is not only a priority of the Commission, but it is our mandate.

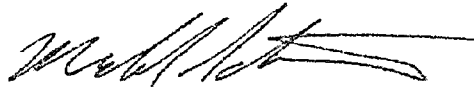
¹ See, e.g., KRS 278.020(9), granting a person over whose property a proposed electric transmission line will cross a right to intervene in the proceeding addressing the construction.

² Also, it should be noted that the issue of intervention before the Commission is currently the subject of litigation in both the Franklin Circuit Court and the Kentucky Court of Appeals as the General Assembly oft has been reluctant to enact legislation dealing with an issue that is the subject of pending litigation.


The original provisions of Senate Bill 100 create a transparent process that would have allowed broad participation among all stakeholder interests with the ability of the Commission to fulfill its statutory directive to establish rates that are fair, just and reasonable to all ratepayers. Unfortunately, instead of permitting the Commission to conduct proceedings addressing net-metered systems using established principles of utility ratemaking, the provisions of HFA 1 create a process that appears to favor the interests of a particular group over other stakeholders, including ratepayers. As such the Commission requests that the Senate reject HFA 1 to Senate Bill 100.

Sincerely,

Kentucky Public Service Commission



Michael J. Schmitt, Chairman



Robert J. Cicero, Vice Chairman



Talina R. Mathews, Commissioner

cc: President Robert Stivers II
Kentucky Senate

Speaker David Osborne
Kentucky House of Representatives



Matthew G. Bevin
Governor

Charles G. Snively
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
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Michael J. Schmitt
Chairman

Robert Cirero
Vice Chairman

Taina R. Mathews
Commissioner

February 14, 2019

Representative Jim Gooch Jr.
Chair, Natural Resources
and Energy Committee
702 Capital Avenue
Annex Room 376
Frankfort, KY 40601

Re: Senate Bill 100

Dear Representative Gooch:

The Public Service Commission supports the manner in which Senate Bill 100, An Act Relating to Net Metering, sponsored by Sen. Brandon Smith, seeks to address the treatment of net-metered systems through the ratemaking process. Since Kentucky's net metering statute was first enacted in 2004 (with amendments in 2008), the electricity sector has undergone rapid and dramatic changes. These changes are not unique to Kentucky, and Kentucky is not alone in examining statutes that were enacted when distributed energy technologies were not as widely available and affordable as they are today.¹ The provision of Senate Bill 100 that would authorize the Commission to establish a utility's compensation for net-metered systems through the ratemaking process is prudent in that it reflects the dynamic nature of today's electricity sector. Importantly, establishing the compensation mechanism through the ratemaking process provides transparency, allows broader participation among stakeholder interests, and helps to ensure that rates are fair, just and reasonable to all customers. As has been demonstrated in multiple proceedings in recent years where the Commission has exercised its statutory authority to consider the benefits of various technologies and programs, as well as best practices from other states, the Commission is uniquely qualified to evaluate this issue in the same thorough manner in which it addresses all the issues presented during a rate case.

For example, in reviewing an application to construct a solar facility, then Vice Chairman Gardner and his fellow Commissioners recognized that the "reasonable, least cost" standard could not be the determining factor and that all relevant factors must be balanced, including load growth, fuel-cost savings of displaced generation, and the potential impact of future CO2 regulations.² Moreover, the Kentucky Supreme Court has

¹ The 50 States of Solar, Q4 update, North Carolina Clean Energy Technology Center, 2018.

² See Order at pp. 11-12 in Case No. 2014-00002, *In the Matter of the Joint Application of Louisville Gas & Electric Company and Kentucky Utilities Company for Certificates of Public Convenience and Necessity for the Construction of a Combined Cycle Combustion Turbine at the Green River Generating Station and a Solar Photovoltaic Facility at the E.W. Brown Generating Station* (Ky. P.S.C. Dec. 19, 2014).

Importantly, the
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Y truly yours,

W. Gardner

W. Gardner



February 14, 2019

recognized that the Commission has broad authority to consider all relevant factors presented during a rate proceeding. *Kentucky Public Service Com'n v. Commonwealth ex rel. Conway*, 324 S.W.3d 373, 383 (Ky 2010) (The Commission has "plenary authority to regulate and investigate utilities and to ensure that rates charged are fair, just, and reasonable under KRS 278.030 and KRS 278.040"). Any concerns that the Commission will not be allowed to consider customer-generators' evidence of the quantifiable benefits of solar energy are unfounded.

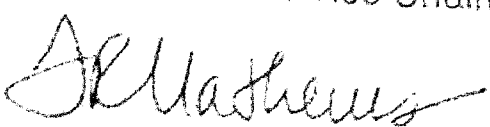
Finally, the Commission must address the notion of reviewing the treatment of net-metered systems in one administrative case. Utilities and the territories they serve have quite distinct differences—from the makeup of industrial, commercial, and residential customers, to how many customers are in urban versus rural areas, to load growth or decline. As a result, the ratemaking process is not intended to be uniform, one-size-fits-all across utilities. It is because of these variations that the Commission has the authority and discretion to establish rates that reflect a utility's unique characteristics and the specific cost of serving that utility's customers. The same holds true for examining the benefits and costs of net-metered systems, which must be viewed in the specific context of the utility in whose territory the system is located.

Sincerely,

Kentucky Public Service Commission


Michael J. Schmitt, Chairman


Robert J. Cicero, Vice Chairman


Talina R. Mathews, Commissioner