

August 22, 2019

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PUBLIC SERVICE COMMISSION

Gwen Pinson, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601 gwen.pinson@ky.gov

Re:

In the Matter of: Electronic Consideration of the Implementation of the Net Metering Act;

Case No. 2019-00256; Request for Extension

Dear Ms. Pinson:

Our firm represents the Kentucky Solar Industries Association, Inc. ("KYSEIA"). KYSEIA is respectfully requesting an extension to submit written comments in Case No. 2019-00256 to October 21, 2019, and to postpone the public hearing date in that case until after October 21, 2019.

KYSEIA is an association of solar business supporters that unites businesses across the solar industry including the contractors responsible for building solar arrays, the developers creating new power plants, the solar manufacturers crafting innovative products, the many businesses that support the industry, and the customers that install solar systems. KYSEIA'S objective is to provide leadership and promote sound policy in Kentucky as the power sector enters the solar age. KYSEIA has been intimately involved in net metering policy and legislation in Kentucky over the past several years.

The Public Service Commission ("Commission"), sua sponte, initiated Case No. 2019-00256, to consider the implementation of Senate Bill 100. July 30, 2019, Order, Case No. 2019-00256 ("Ord.") at 1. The Commission has invited "comments from interested utilities and stakeholders in order to develop a record which the Commission can draw upon as it considers broad issues of implementation of the Net Metering Act as they apply to individual utilities." *Id.* The record compiled will be "incorporated by reference into any ratemaking proceedings initiated by retail electric utilities pursuant to the Net Metering Act." *Id.* The Commission required written comments to be filed no later than September 20, 2019, and is holding a public hearing to accept comment on October 1, 2019. *Id.* at 2.

KYSEIA is an interested stakeholder, and will be submitting substantial comments in this case. However, KYSEIA has been active in preparation for the 2020 net metering rate cases and experts have only recently been retained to

provide evaluation of the implementation of SB 100 and net metering rates in Kentucky. Considering the relative short notice of the net metering administrative case deadlines, the complexity of the net metering issues, and the incorporation of this administrative record into subsequent net metering rate cases, KYSEIA is respectfully requesting an extension of thirty days to submit written comments, with a new deadline of October 21, 2019.

KYSEIA also understands that the Commission will not only be taking public comment at the October 1, 2019, public hearing, but the Commissioners may also be asking questions and having a dialogue with those making comments to assist in determining issues to be considered in future net metering rate cases. In light of this, KYSEIA is also respectfully requesting the public hearing be postponed until after October 21, 2019, at a date and time that is convenient for the Commission to allow KYSEIA and other interested stakeholders much needed time to prepare for such a hearing.

Thank you for your assistance and please contact me if there are any questions concerning this request.

Sincerely,

Randy Strobo Clay Barkley

Strobo Barkley PLLC Counsel for KYSEIA