

**From:** [PSC - Public Information Officer](#)  
**To:** [Nancy Givens](#)  
**Subject:** your comments in case 2019-00256 - Implementation of the Net Metering Act  
**Date:** Tuesday, September 10, 2019 2:00:00 PM

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Dear Ms. Givens:

Thank you for the comments you have submitted to the Kentucky Public Service Commission in case 2019-00256. They will be placed into the case record for the Commission to consider as it prepares its final report in the matter.

Comments received and all other records in this case are available on the PSC website at [https://psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2019-00256](https://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2019-00256).

The hearing in this matter will be held on Wednesday, November 13, 2019, at 9 AM Eastern Standard Time at the PSC offices, 211 Sower Boulevard in Frankfort. It is open to the public and those in attendance will have an opportunity to address the Commission. The hearing also will be streamed live via the PSC website, [psc.ky.gov](http://psc.ky.gov).

Please continue to cite the case number in any future correspondence in this matter.

Thank you again for your interest in this matter.

Andrew Melnykovich  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovich@ky.gov](mailto:Andrew.melnykovich@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

**RECEIVED**  
By PSC at 3:56 pm, Sep 10, 2019

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**From:** Nancy Givens <[REDACTED]>  
**Sent:** Monday, September 9, 2019 5:02 PM  
**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>  
**Subject:** Re: your comments in case 2019-00256 - Implementation of the Net Metering Act

I live at 3015 Brownsboro Rd., #11, Louisville, KY 40206. Please let me know if anything else is needed.

Thanks,  
Nancy Givens

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**From:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>

**Sent:** Monday, September 9, 2019 3:58 PM

**To:** Nancy Givens <[REDACTED]>

**Subject:** your comments in case 2019-00256 - Implementation of the Net Metering Act

Dear Ms. Givens:

Could you please provide your place of residence in Kentucky. Thank you.

Andrew Melnykovich

Director of Communications/Public Information Officer

Kentucky Public Service Commission

211 Sower Boulevard, Frankfort KY 40601

[Andrew.melnykovich@ky.gov](mailto:Andrew.melnykovich@ky.gov)

Direct line 502-782-2564

Cell 502-330-5981

Main 502-564-3940

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**From:** Nancy Givens <[REDACTED]>

**Sent:** Saturday, September 7, 2019 9:57 AM

**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>

**Subject:** Re: Implementation of Net Metering Act, Case No. 2019-00256

Dear Commissioners:

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 and to our energy grid; public health, economic development, climate protection, and more.

Recent Studies show that wind and utility-scale solar now have the lowest levelized cost in a growing number of regions. In Indiana, solar and wind are proving to be more cost-effective energy options than keeping existing coal plants open. Northern Indiana Public Service Co. (NIPSCO's) 2018 Integrated Resource Plan (IRP) found that eliminating coal from its portfolio is the cheapest option, and a portfolio of solar, storage, wind and demand management, along with a small amount of market purchases from the Midcontinent ISO, is the most cost effective.

Net metering is an essential tool in enabling decentralized renewable energy production that gives greater control over customers' energy sources and costs. The Commission should protect customers' right and ability to make investments to produce their own power and control their energy costs. In addition, excess energy produced during peak production hours that is fed onto the grid reduces peak load and utility costs. This should be factored into the rate structure.

Studies in diverse states including MN, UT, TX, NJ, ME, and others have found that

distributed solar energy delivers greater benefit to the grid than the reverse and that net metering should be preserved and expanded to ensure fair compensation to customers who install solar energy not the reverse. Rather than creating new barriers to solar and other renewable energy adoption, new tariff structures should incorporate the full benefits of solar energy to the grid. These include avoided fuel costs, reduced line losses, avoided investment in new capacity, reduced financial risks from volatile fuel sources, increased grid resiliency, environmental benefits, reduced public health threats, local job creation and economic development, and local energy self-sufficiency.

The utility argument that rooftop solar customers are not paying their fair share for upkeep to the energy grid is similarly flawed. Solar customers already pay to upkeep the grid through the fixed energy charge on their bills, and an analysis of Kentucky utility data revealed 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. Furthermore, the existence of the 1% cap on growth of net metering is a significant limit to any potential rate impacts from net metering.

Also important to consider is that the utilities' business model is outdated, and does not comply with current realities and the relative benefits and low costs of renewable energy. The rate structure should not enable this outdated, shareholder-focused model that rewards utilities for over building. Utilities build too much and they want to sell as much power as they possibly can because this model allows them to keep asking for rate increases that fund new, often redundant infrastructure and funnel profits to shareholders. Then, they cry about not being able to sell that power. This is an unproductive business model that costs Kentucky consumers and especially harms the low income and those on fixed incomes.

While state and federal governments don't like to talk about it, we can see the huge and growing costs associated with flooding, drought, hurricanes, wildfires, etc. tied to climate change. It is no longer credible to argue that there is no need to find ways to shift swiftly away from fossil fuels and increase reliance on clean and renewable energy sources. Policies should support and comply with new these realities, and new tariff structures should avoid creating new barriers to solar or other renewable energy adoption.

Finally, 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. The proposed solution is likely more costly than the problem.

Rate designs should not be used as tools to inhibit the use of net metering. An evidence-based, transparent process open to public review and analysis should be used and the full impacts to the utility and ratepayers including full benefits from distributed solar should be considered before any changes to net metering tariffs are implemented. A business model for utilities is needed that puts the needs of Kentucky ratepayers and communities above those of often out-of-state shareholders.

Thank you for your consideration.

Sincerely,

Nancy Givens

Sent from [Mail](#) for Windows 10

**From:** [PSC - Public Information Officer](#)  
**To:** [Carl Hall](#)  
**Subject:** your comments in case 2019-00256 - Implementation of the Net Metering Act  
**Date:** Tuesday, September 10, 2019 1:59:00 PM

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Dear Mr. Hall:

Thank you for the comments you have submitted to the Kentucky Public Service Commission in case 2019-00256. They will be placed into the case record for the Commission to consider as it prepares its final report in the matter.

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Please continue to cite the case number in any future correspondence in this matter.

Thank you again for your interest in this matter.

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovych@ky.gov](mailto:Andrew.melnykovych@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

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**From:** Carl Hall <[REDACTED]>  
**Sent:** Monday, September 9, 2019 7:47 PM  
**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>  
**Subject:** RE: your comments in case 2019-00256 - Implementation of the Net Metering Act

My residence is:  
4718 Kitty Hawk Way  
Louisville, KY 40207

Sent from [Mail](#) for Windows 10

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**From:** PSC - Public Information Officer

**Sent:** Monday, September 9, 2019 3:58 PM

**To:** [Carl Hall](#)

**Subject:** your comments in case 2019-00256 - Implementation of the Net Metering Act

Dear Mr. Hall-

Could you please provide your place of residence in Kentucky. Thank you.

Andrew Melnykovich

Director of Communications/Public Information Officer

Kentucky Public Service Commission

211 Sower Boulevard, Frankfort KY 40601

[Andrew.melnykovich@ky.gov](mailto:Andrew.melnykovich@ky.gov)

Direct line 502-782-2564

Cell 502-330-5981

Main 502-564-3940

**From:** Carl Hall <[REDACTED]>

**Sent:** Saturday, September 7, 2019 4:44 PM

**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>

**Subject:** Re Case 2019-00256: Grow solar energy in Kentucky!

Dear Public Service Commission,

I believe that developing renewable/sustainable sources of energy is a critical part of our response to the developing climate crisis. Solar energy must play a substantial part in our sustainable energy portfolio. I believe that, over time, the monopoly utilities will increase the share of their energy generation represented by solar, but I don't believe that they will do it quickly enough to mitigate the effects of climate change.

We should encourage individual citizens to step up and install as much solar or wind driven energy production as possible. SB100, as passed by the legislature last year, is likely to be used as a tool to modify the state's net metering program and reduce the amount of distributed solar installed, unless the commission steps up and reaffirms the important role that distributed solar has in the generation portfolio for this state.. The utilities and their investors will be happy if it is more difficult for individuals to install distributed solar, but it won't help the citizens of Kentucky in the long term.

Retail net metering enables people to become more energy independent with solar and fight back against monopoly utilities that have had a stranglehold on electricity for the past century. People should have the right to produce, use, and share their own energy and not be reliant on others.

More solar energy means more good jobs for Kentucky. More solar energy also means more good jobs for Kentucky. Neighboring states like Illinois and Tennessee have 3x the number of solar jobs compared to Kentucky. Let's grow the economy, create jobs, and make our state

more energy independent.

I urge you to protect solar energy in Kentucky!

Sincerely,  
Carl Hall  
United States

A solid black rectangular redaction box covering the signature area, with a small vertical line extending downwards from the bottom left corner.

**From:** [PSC - Public Information Officer](#)  
**To:** [Todd Lewis](#)  
**Subject:** your comments in case 2019-00256 - Implementation of the Net Metering Act  
**Date:** Tuesday, September 10, 2019 1:59:00 PM

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Dear Mr. Lewis:

Thank you for the comments you have submitted to the Kentucky Public Service Commission in case 2019-00256. They will be placed into the case record for the Commission to consider as it prepares its final report in the matter.

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Thank you again for your interest in this matter.

Andrew Melnykovich  
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Kentucky Public Service Commission  
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[Andrew.melnykovich@ky.gov](mailto:Andrew.melnykovich@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

**From:** Todd Lewis <[REDACTED]>  
**Sent:** Monday, September 9, 2019 10:10 PM  
**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>  
**Subject:** Re: Re Case 2019-00256: Solar energy is critical to future

Jefferson county.

F. Todd Lewis

\* VOICE DICTATED FROM SMART PHONE. May not be all that smart. Please forgive any errors

On Mon, Sep 9, 2019, 2:57 PM PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)> wrote:

Dear Mr. Lewis:

Could you please provide your place of residence in Kentucky. Thank you.

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovych@ky.gov](mailto:Andrew.melnykovych@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

**From:** Todd Lewis <[REDACTED]>  
**Sent:** Tuesday, September 3, 2019 10:12 AM  
**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>  
**Subject:** Re Case 2019-00256: Solar energy is critical to future

Dear Public Service Commission,

I am writing to specifically oppose altering the rate structure for retail net metering. The proposal would set back a growing industry in Kentucky, and is so fundamentally unfair as to smell like an intentional attempt to damage the industry in favor of traditional fossil fuel production.

I have begun solar installation on a very small scale off the grid, and then moved to a medium-scale at my home, but still off the grid. This was all done on my own time and labor, so as to better understand the precise physics and economics, and ultimately to move to grid-tied solar. There are many like me, and many who support this movement. I will be unable to feasibly make the next step of investment with this kind of setback. The current power industry is, by definition, compensated appropriately for their infrastructure. To claim otherwise is nothing but a ruse to harm competitive sources of power. Please do not accept this.

Retail net metering enables people to become more energy independent with solar and fight back against monopoly utilities that have had a stranglehold on electricity for the past century. People should have the right to produce, use, and share their own energy and not be reliant on others.

More solar energy means more good jobs for Kentucky. More solar energy also means more good jobs for Kentucky. Neighboring states like Illinois and Tennessee have 3x the number of solar jobs compared to Kentucky. Let's grow the economy, create jobs, and make our state more energy independent.

I urge you to protect solar energy in Kentucky!

Sincerely,

F. Todd Lewis

|

**From:** [PSC - Public Information Officer](#)  
**To:** [Ron's Email](#)  
**Subject:** your comments in case 2019-00256 - Implementation of the Net Metering Act  
**Date:** Tuesday, September 10, 2019 2:00:00 PM

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Dear Mr. Whitmore:

Thank you for the comments you have submitted to the Kentucky Public Service Commission in case 2019-00256. They will be placed into the case record for the Commission to consider as it prepares its final report in the matter.

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Andrew Melnykovich  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovich@ky.gov](mailto:Andrew.melnykovich@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

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**From:** Ron's Email <[REDACTED]>  
**Sent:** Monday, September 9, 2019 4:50 PM  
**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>  
**Subject:** Re: your comments in case 2019-00256 - Implementation of the Net Metering Act

Ronald Whitmore  
281 Nealy Road  
Alvaton Ky 42122  
[REDACTED]

Sent from my iPhone

On Sep 9, 2019, at 2:54 PM, PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)> wrote:

Dear Mr. Whitmore:

Could you please provide your place of residence in Kentucky. Thank You.

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovych@ky.gov](mailto:Andrew.melnykovych@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

**From:** RONALD WHITMORE <[REDACTED]>  
**Sent:** Wednesday, August 28, 2019 1:23 PM  
**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>  
**Subject:** Re Case 2019-00256: Solar energy is critical to future

Dear Public Service Commission,

As your constituent, I am writing to tell you how important solar energy is to Kentucky's future, and how critical our state's retail net metering program is to that future.

Retail net metering enables people to become more energy independent with solar and fight back against monopoly utilities that have had a stranglehold on electricity for the past century. People should have the right to produce, use, and share their own energy and not be reliant on others.

More solar energy means more good jobs for Kentucky. More solar energy also means more good jobs for Kentucky. Neighboring states like Illinois and Tennessee have 3x the number of solar jobs compared to Kentucky. Let's grow the economy, create jobs, and make our state more energy independent.

I urge you to protect solar energy in Kentucky!

The economic benefits of solar are many, and ALL BENEFITS including environmental and health MUST be considered by the PSC when determining appropriate value of solar distributed energy. There are well documented recent value assessments and many other studies which quantify economic benefits. These include Arkansas Study of Cost Benefits of Net metering Sept 2017, and recent EPA report July 2019 on \$ Health Benefits of solar \$ per kWh.

Kentuckians value their health and clean environment, and all will benefit from distributed solar energy.

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Sincerely,

RONALD WHITMORE  
KY  
United States



