

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: Comments on PSC Case Number 2020-00174
Date: Tuesday, September 15, 2020 8:23:00 AM

Matthew Clarke,

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601
502-782-6329

-----Original Message-----

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Monday, September 14, 2020 1:17 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: Comments on PSC Case Number 2020-00174

-----Original Message-----

From: [REDACTED]
Sent: Sunday, September 13, 2020 1:37 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Comments on PSC Case Number 2020-00174

Dear Kentucky Public Service Commission,

I am writing to express my concern about proposals listed in case no. 2020-00174.

Although I am not a Kentucky Power ratepayer, I would like to suggest that we should be doing MORE to encourage rooftop solar, not changing rates to discourage customers from this clean

energy alternative! Kentuckians need less reliance on coal and fossil fuels.

With this in mind, I urge the Commission to pay careful attention to PROCESS in this rate case.

1. Any net metering rate for grid-tied solar customers that the PSC signs off on must be grounded in a careful analysis of the costs AND the benefits that distributed solar brings to the utility. These benefits include the overlap between solar peak production and peak energy demand, reduced line loss and wear and tear on the grid, and health and environmental benefits. The quantifiable health benefits from the EPA's "2019 Public Health Benefits per kWh of Energy Efficiency and Renewable Energy in the United States" technical report, as well as processes developed by other states that have successfully included solar benefits in their value of solar analysis, would be valuable resources to consider. The PSC should also require Kentucky Power to prove, with utility-specific data, the existence of any costs and cost-shifting imposed by the old net metering system.
2. The PSC's process must include updates to the 2008 Interconnection Guidelines, which the Commission expressed an intention to do in December 2019 (in the final order of case 2019-00256). These guidelines must be updated prior to the adoption of new net metering rates for any utility.
3. Any attempt to raise rates during this precarious economic moment must fully consider the impact that these increased rates will have on a utility's ratepayers, which are entitled to fair, just, and reasonable rates. It is therefore crucial that the PSC take ample time to solicit, and truly incorporate, broad public input on how Kentucky Power's proposed rate increase would impact ratepayers. In order to do this, the Commission should offer at least three public hearings (preferably virtual, but with clear ways for those without internet to dial in or otherwise submit input) that are held outside of working hours and that are announced to the public with at least one month's notice. The Commission should also communicate clearly with the public how they intend to incorporate trends from public comments into their final order on the rate case.

Thank you for your consideration.

Sincerely,

Matthew Clarke

510 Central Ave Lexington, KY 40502-1797 [REDACTED]

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Thomas J FitzGerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KENTUCKY 40602

*Lisa A. Lucas
Administrative Assistant
Jenkins Fenstermaker, PLLC
325 Eighth Street
Huntington, WEST VIRGINIA 25701

*Barry Alan Naum
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Clay A. Barkley
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*Joe F Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, KENTUCKY 40507

*Michael A Frye
Honorable
Jenkins Fenstermaker, PLLC
325 Eighth Street
Huntington, WEST VIRGINIA 25701

*Carrie H Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NORTH CAROLINA 27103

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Matt Partymiller
President
Kentucky Solar Industries Association
1038 Brentwood Court
Suite B
Lexington, KENTUCKY 40511

*Christen M Blend
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216

*Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Don C Parker
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WEST VIRGINIA 25301

*Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Honorable David Edward Spenard
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Honorable Mark R Overstreet
Attorney at Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Robert D. Gladman
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216

*Randal A. Strobo
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202