

From: [PSC Executive Director](#)
To: [REDACTED]
Subject: Support For Complaint/Case Number 2022-00030 Alfred Saylor V. Kentucky Utilities Company
Date: Wednesday, February 2, 2022 10:10:00 AM

Thank you for your comments on the case regarding Alfred Saylor v. Kentucky Utilities 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, 2022-00030, in any further correspondence. The documents in this case are available at [View Case Filings for: 2022-00030 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Bramblett, Andrea (PSC) <andrea.bramblett@ky.gov>
Sent: Tuesday, February 1, 2022 11:36 AM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: Support For Complaint/Case Number 2022-00030 Alfred Saylor V. Kentucky Utilities Company

From: Steve Ricketts [REDACTED]
Sent: Tuesday, February 1, 2022 11:10 AM
To: PSC Public Comment <psc.comment@ky.gov>
Cc: Steve Ricketts [REDACTED]
Subject: Support For Complaint/Case Number 2022-00030 Alfred Saylor V. Kentucky Utilities Company

Dear Sir or Madam

As a Kentucky based solar industry member and prior solar construction company owner with over 2500 installs on record, I wish to lodge my full support for Mr. Saylor complaint regarding Kentucky Utilities using the unauthorized and rejected instantaneous netting approach to calculating his recent utility bills.

Having been closely involved in the original legislation (SB100) that established NMS-2 and through my trade association, KYSEIA, in the PSC adjudication process I can find no tariff documentation or guidance that would make adoption of this aggressive charging structure anything but an attempt to circumvent your ruling of September 24th 2021.

To the contrary the NMS-2 tariff issued on November 9th very clearly establishes this as a monthly net metering arrangement where energy consumed from the company is to be set against self-generated (solar) energy and any excess credited at \$0.06924/kWh. There seems to be no ambiguity to this at all. More than that the Commission commented in it September ruling:

'This [rejection] is because LG&E/KU's proposed instantaneous credit for all energy exported on to the grid is inconsistent with the plain language of

KRS

278.465(4), which provides that “net metering means the difference between” the dollar value of all electricity generated by an eligible customer-generator that is exported to the grid over a billing period and the dollar value of all electricity consumed by the eligible customer-generator over the same billing period’

At this moment then KU seems to be willfully flouting PSC and Franklin Court guidance. Aside of the harm caused to Mr. Saylor, this approach by LG&E/KU will have the intended effect of introducing, once again, uncertainty into the small residential solar market which will slow sales and install rate. If one cannot be certain of the financial returns of a significant dollar value investment in your home, you will not make the purchase. Worse, Instantaneous netting if applied would further devalue the worth of homeowner energy generated and could result in a yearly doubling of bills. A comparative model from another utility shows that effect:

Month Start	Net Metering	Monthly Net Billing	Hourly Net Billing	Dual-channel Billing
July 1, 2019	\$64.14	\$64.14	\$122.92	\$148.10
August 1, 2019	\$70.84	\$70.84	\$128.91	\$150.38
September 1, 2019	\$58.96	\$58.96	\$121.89	\$142.33
October 1, 2019	\$26.82	\$26.82	\$91.93	\$102.44
November 1, 2019	\$99.71	\$99.71	\$138.14	\$148.98
December 1, 2019	\$136.49	\$136.49	\$161.87	\$171.70
January 1, 2020	\$145.46	\$145.46	\$167.46	\$176.49
February 1, 2020	\$102.22	\$102.22	\$142.36	\$152.22
March 1, 2020	\$44.78	\$44.78	\$101.64	\$113.14
April 1, 2020	-\$18.82	-\$3.50	\$70.33	\$82.54
May 1, 2020	\$4.11	\$4.11	\$81.85	\$97.35
June 1, 2020	\$42.03	\$42.03	\$110.11	\$131.19
Total	\$776.74	\$792.06	\$1,439.40	\$1,616.86

	No Solar	Net Metering	Monthly Net Billing	Hourly Net Billing	EDG Estimate
Annual Electricity Bill (Year 1)	\$1,993	\$273	\$342	\$1,081	\$1,211
Net Present Value		\$2,118	\$1,039	(\$8,840)	(\$9,901)
Simple Payback		10.7 years	11.3 years	22.5 years	25.2 years

Having looked at just this type of information I can't help but point out that the Indiana Court

of Appeals just yesterday struck down an identical instantaneous approach by Vectren/Centrepoint:

<https://www.solarpowerworldonline.com/2022/01/indiana-court-of-appeals-strikes-down-utility-net-metering/>

Within the solar industry last September's PSC ruling on NMS-2 gained significant praise for being a thoughtful and diligent exercise in reaching a fair value of solar for all parties and I am hopeful that the 'after the fact' actions by Kentucky Utilities will be seen for what they are. I well remember one of the members of the Natural Resources & Energy Committee asking us to have faith in the good and balance judgement of the Kentucky PSC, and it seems we are once again at that point.

My appreciation for considering this input.

Steve Ricketts

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