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March 14, 2024

***Via Electronic Filing**

Ms. Linda C. Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

Re: *In the matter of Roger D. Shocklee, Complainant vs. Kenergy Corp - Case No. 2023-00421*

Dear Ms. Bridwell:

Enclosed, please find for filing, Kenergy Corp.'s Response to Commission Staff's First Request for Information entered March 8, 2024 and a Motion for Confidentiality in the above-styled case.

This is to certify that the electronic filing has been transmitted to the Commission on March 14, 2024 and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be made.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,


Brittany Hayes Koenig

Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ROGER D. SHOCKLEE	COMPLAINANT)	
)	
V.)	CASE NO.
)	2023-00421
KENERGY CORPORATION)	
	DEFENDANT)	

MOTION FOR CONFIDENTIAL TREATMENT

Comes now Kenergy Corporation (Kenergy or Company), by counsel, pursuant to the KRS 61.878(1)(m), and does hereby tender its Motion for Confidential Treatment, respectfully stating as follows:

1. Contemporaneously with this Motion, Kenergy has filed its Verified Response to Commission Staff’s First Requests for Information entered March8, 2024 (“Response”).

2. Kenergy has also provided, as exhibits to its Response, certain maps as Exhibit A and B. These items are referred to herein collectively as the “Confidential Information.” KRS 61.878(1)(m)(g) protects

(m) Public records the disclosure of which would have a reasonable likelihood of threatening the public safety by exposing a vulnerability in preventing, protecting against, mitigating, or responding to a terrorist act and limited to:...(g) the following records when their disclosure will expose a vulnerability referred to in this subparagraph: detailed drawings, schematics, *maps*, or specifications of structural elements, floor plans, and operating, utility, or security systems of any building or facility owned, occupied, leased, or maintained by a public agency. (Emphasis added)

4. The Confidential Information consists of information about Kenergy's system that includes maps of its system that may expose a vulnerability that may threaten public safety should they be disclosed.

5. In accordance with the provisions of 807 KAR 5:001, Section 13(2), Kenergy is filing one (1) copy of the unredacted Response and exhibits separately under seal with the Confidential Information highlighted or otherwise denoted.

6. In accordance with the provisions of 807 KAR 5:001, Section 13(2), Kenergy respectfully requests that the Confidential Information be withheld from public disclosure for a period of ten years.

7. If, and to the extent, the Confidential Information becomes publicly available or otherwise no longer warrants confidential treatment., Kenergy will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10).

WHEREFORE, on the basis of the foregoing, Kenergy respectfully requests that the Commission classify and protect as confidential the specific Confidential Information described herein for a period of ten years.

This 14th day of March, 2024.

Respectfully submitted,



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Counsel for Kenergy Corp.

CERTIFICATE OF SERVICE

This is to certify that the foregoing filing is a true and accurate copy of the document being filed; that the filing was transmitted to the Commission (PSCED@ky.gov) on March 14, 2024.

Brittany Hays Kenergy
Counsel for Kenergy Corp.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ROGER D. SHOCKLEE	COMPLAINANT)	
)	
V.)	CASE NO.
)	2023-00421
KENERGY CORP.)	
	DEFENDANT)	

KENERGY CORP.'S VERIFIED RESPONSE TO
COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION
ENTERED MARCH 8, 2024

Comes now Kenergy Corp. ("Kenergy or Company"), by counsel, and does hereby tender its Verified Response to Commission Staff's First Requests for Information entered March 8, 2024.

Entered March 14, 2024.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

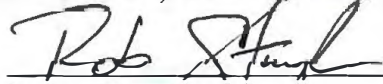
IN THE MATTER OF:

ROGER D. SHOCKLEE	COMPLAINANT)	
)	
V.)	CASE NO.
)	2023-00421
KENERGY CORP.)	
	DEFENDANT)	

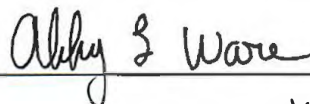
VERIFICATION OF KENERGY CORP.'S VICE-PRESIDENT, ROBERT STUMPH

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF HENDERSON)

Robert Stumph, Vice-President of Engineering of Kenergy Corp, being duly sworn, states that he has supervised the preparation of his Responses to Commission Staff's First Requests for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

 3/11/24
Robert Stumph

The foregoing Verification was signed, acknowledged and sworn to before me this 11th day of March, 2024, by Robert Stumph.



Notary Commission No. KYNP27712

Commission expiration: 4-20-2025



Kenergy Corp.
Case No. 2023-00421
Commission Staff's First Request for Information

Request 1. Refer to the February 23, 2024 response to Complainant's motion, Direct Testimony of Robert Stumph, page 6, which states, "Using the most lenient description of a 'line section', there is not sufficient capacity on the feeder to allow for the solar array."

- a. Explain what is meant by "most lenient description of a line section. Describe how Kenergy determined the most recent annual one-hour peak load on the line section for purposes of reviewing Mr. Shocklee's application.
- b. Describe how Kenergy determined the most recent annual one-hour peak load on the line section using the "most lenient description of a line section."
- c. Describe how Kenergy determined the amount of aggregated generation on the circuit, including the proposed generating facility.
- d. Provide calculations of the aggregated generation's percentage of the line section's most recent annual one hour peak load as used in reviewing Mr. Shocklee's application.
- e. Provide calculations of the aggregated generation's percentage of the line section's most recent annual one hour peak load using the "most lenient description of a line section."

Response 1a. The definition of line section in Kenergy's tariff, Schedule 46, states "the smallest part of the primary distribution system the generating facility could remain connected to after the operation of any sectionalizing devices". This definition is not clearly written.¹ Kenergy's

¹ Case No. 2008-00169, *Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity up to Thirty Kilowatts* (KY. PSC Jan. 8, 2009). The Commission ordered the jurisdictional utilities made party to the administrative case to file net metering tariffs and application forms to comply with the

interpretation, regarding which it has requested guidance from the Commission,² has been that using the substation feeder recloser as the “line section” would allow for the greatest amount of solar capacity available to members. In essence, the entire feeder peak kW is used to determine the 15% solar capacity allowance, as opposed to a section of line at a downstream device on the feeder. In short, because it was not clear from the language in the statute, Kenergy interpreted “line section” as the whole line, in order to make the most capacity available for its members, and thus it is the absolute most or most “lenient” interpretation of what was meant by “line section” in Kenergy’s tariff. For example, using the data for the feeder at issue for Mr. Shocklee’s applications, the feeder recloser had a peak load of 914.3 kW on the C phase (as highlighted in yellow on the data table on Exhibit A). Therefore, 15% of 914.3 kW is 137.1 kW of solar on C phase. Presently, there is 39.3 kW available on C phase. See Exhibit A, containing one table that indicates it is for the Nuckols Feeder 3 substation location using the whole line as the reference per Kenergy’s interpretation of “line section” in its tariff. For comparison, see Exhibit A’s other table indicating an alternative point of reference for the 251-6-R1 location, which shows that using this alternative interpretation of “line segment” would mean there is less capacity available for members. This alternative uses the recloser protecting the lateral tap that serves the area in question to mark the line section and that peak load on C phase was 222.9 kW. The alternative example allows 15% of 222.9 kW or 33.4 kW of solar on that phase. Any alternative interpretation of “line section” would mean less capacity available to members, because Kenergy’s interpretation is that the “line section” is the whole line. Presently, there is no capacity available with 38.3 kW of solar above the 15% limit. See Exhibit A “Nuckols

“Interconnection and Net Metering Guidelines – Kentucky,” which was also adopted as Appendix A to the same Order. Kenergy filed its tariff April 24, 2009.

² *Case No. 2023-00309, Electronic Petition for Declaratory Order*, (filed Sept. 13, 2023).

Feeder 3 – Line section example”. Exhibit A is being filed under seal pursuant to a motion for confidential treatment.

Response 1b. Kenergy keeps records for our rural system peak KW Demand for each month. Also, Kenergy has AMI interval data on all meters. We review the most recent 12 months and use both the summer and winter peak kW times. This was done because some substations are winter peaking and others are summer. Using the AMI data, extracted for the hour in which Kenergy established both summer and winter peaks, kW for each substation feeder was obtained, using Milsoft software. The tables shown in Exhibit A are examples of the data collected. One table indicates it is for the Nuckols Feeder 3 substation location using the whole line as the reference per Kenergy’s interpretation of “line section” in its tariff, and the other is an alternative point of reference for the 251-6-R1 location, which shows that using a safety device as a marker, the alternative interpretation of “line segment” would mean there is less capacity available for members. These tables contain the data described above, including the capacity for each phase. Exhibit A is being filed under seal pursuant to a motion for confidential treatment.

Response 1c. Using the approach described in 1b. above, an Excel file is generated showing peak kW for each substation feeder. Kenergy keeps record of all solar array locations and their capacity.

Response 1d. Kenergy keeps record of each solar array’s capacity using Milsoft WindMil software. The software allows for a query, by feeder, for the existing solar array capacity. Any new application’s solar generation capacity is added to the existing generation and then compared to 15% of the feeder peak KW. In this case, see Exhibit A, Nuckols Feeder 3 had a peak load of 914.3 kW on C phase, in the past 12 months. Fifteen percent of the peak equals 137.1 kW. There is already 97.8 kW Solar on that phase. This leaves $(137.1 - 97.8 =) 39.3$ kW

available for solar. See Exhibit A, information from Excel file in table with Location entitled “Nuckols F3 Recloser” for calculations, see also the Excel spreadsheet, entitled “Feeder Solar” for calculations, filed separately in the electronic filing system. Exhibit A is being filed under seal pursuant to a motion for confidential treatment.

Response 1e. The Milsoft software calculated the amount of solar generation for each feeder. This information is extracted and compiled in an Excel spreadsheet, entitled “Feeder Solar” for calculations, filed separately in the electronic filing system.

Kenergy Corp.
Case No. 2023-00421
Commission Staff's First Request for Information

Request 2. Provide a diagram or map of that portion of Kenergy's electric distribution system from the end of the radial distribution circuit to which Complainant's proposed generating facilities would interconnect upstream to the distribution substation and any other source of generation feeding the section of line to which Complainant's proposed generating facilities would interconnect. Such diagram or map shall identify and describe:

- a. The primary and secondary circuits that serve the section of line to which Complainant's proposed generating facilities would interconnect.
- b. The location and type of all sectionalizing devices, reclosers, and fuses on primary and secondary circuits between the substation (and any other source of generation) and the section of line to which Complainant's proposed generating facilities would interconnect.
- b. The portion of the distribution circuit that Kenergy contends is the applicable "Line Segment," as defined in Kenergy's tariff, Schedule 46-Net Metering, Sheets 46C.

Response 2a-c. Please reference Exhibit B, which contains all of the items Staff has requested and reference Exhibit A, as well which is corresponding, however it is focused on the property at issue in Mr. Shocklee's applications and the data analysis used to review those applications. Both Exhibit A and B are being filed under seal pursuant to a motion for confidential treatment.

EXHIBITS A & B
FILED UNDER
SEAL PURSUANT
TO A MOTION FOR
CONFIDENTIAL
TREATMENT