

October 4, 2024

**\*Via Electronic Filing**

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

**RECEIVED**

**OCT 04 2024**

**PUBLIC SERVICE  
COMMISSION**

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

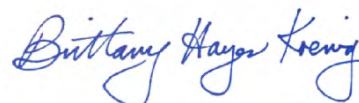
Dear Ms. Bridwell:

Enclosed, please find for filing, Kenergy Corp.'s Response to Commission Staff's Second Request for Information entered September 27, 2024 in the above-styled case.

This is to certify that the electronic filing has been transmitted to the Commission on October 4, 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 CORP.		)	
	DEFENDANT	)	

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KENERGY CORP.’S VERIFIED RESPONSE TO  
COMMISSION STAFF’S SECOND REQUEST FOR INFORMATION  
ENTERED SEPTEMBER 27, 2024

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Comes now Kenergy Corp. (“Kenergy or Company”), by counsel, and does hereby tender its Verified Response to Commission Staff’s Second Request for Information entered September 27, 2024.

Filed October 4, 2024.



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

**Request 1.** Refer to Kenergy's response to Commission Staff's First Request for Information to Kenergy, Item 1e. Provide the calculation of available capacity on Mr. Shocklee's line section under the 15 percent rule as defined in the final Order in Case No. 2023-00309<sup>1</sup> stating, "The term 'line section' in the first condition under Kenergy's Net Metering Tariff for a Level 1 Interconnection means the portion of Kenergy's distribution system connected to a customer-generator bounded by the first sectionalizing device upstream from the customer's proposed facility and the end of the radial distribution line."

**Response 1.** Based upon the definition of "line section" given in the Commission's August 6, 2024 Order,<sup>2</sup> the first sectionalizing device upstream from Mr. Shocklee's proposed facility is a set of reclosers at location 251-6-R1. Mr. Shocklee's proposed facility is on C phase. All available solar capacity on C phase has been consumed by other solar arrays, which are all owned by Mr. Shocklee. The table below shows the loading on the recloser at 251-6-R1.

Location	Phase	Total Solar (KW)	Peak Load (KW)	15% of Peak (KW)	Solar Capacity Available
251-6-R1	C	71.7	201.7	30.3	-41.4

<sup>1</sup> Case No. 2023-00309, *Electronic Petition of Kenergy Corp. for a Declaratory Order* (Ky. PSC Aug. 6, 2024), Order at 8.

<sup>2</sup> *Id.*

For context, C phase is presently 41.4KW over the 15% limit, applying the definition from the Commission's August 6, 2024 Order.<sup>3</sup> Kenergy previously used a very liberal interpretation of "line section" for the benefit of the member, and looked at loading on the feeder recloser. Based upon Kenergy's prior definition of "line section", the 71.7KW of solar did not exceed the 15% rule on the feeder recloser. The solar capacity on the C phase recloser at 251-6-R1 is now at 35.5% of the peak load. The intent of the 15% rule is to allow solar, but not to the point where reverse flow could cause issues with the operation of the system. While Kenergy does not believe that there is a risk to reliability at this time, we will monitor the reclosers, being mindful of any issues that may arise.

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<sup>3</sup> *Id.*