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**PUBLIC SERVICE  
COMMISSION**

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INTERCONNECTION AND NET METERING )  
GUIDELINES FOR RETAIL ELECTRIC ) ADMINISTRATIVE  
SUPPLIERS AND QUALIFYING ) CASE NO. 2008-00169  
CUSTOMER-OWNED GENERATORS )

**MOTION OF JOSHUA BILLS FOR FULL INTERVENTION**

Comes Joshua Bills, by counsel, and moves to intervene in the above-captioned proceeding as a full party. Pursuant to 807 KAR 5:001 Section 3(8), Movant respectfully requests that he be accorded the rights and privileges of a full intervenor in this proceeding, and in support thereof, states as follows:

1. Intervention in formal proceedings before the Kentucky Public Service Commission (Commission) is governed by 807 Kentucky Administrative Regulation (KAR) 5:001 Section 3(8), which provides in relevant part that:

In any formal proceeding, any person who wishes to become a party to a proceeding before the Commission may by timely motion request that he be granted leave to intervene. Such motion shall include his name and address and the name and address of any party he represents and in what capacity he is employed by such party.

807 KAR 5:001 Section 3(8).

2. This proceeding, which is an administrative case initiated by motion of the Commission on May 30, 2008 in order to establish interconnection and net metering guidelines as directed by the General Assembly in Senate Bill 83 (2008), is a "formal proceeding" within the meaning of 807 KAR 5:001 Section 3(8).

3. Joshua Bills is an energy specialist currently employed at the Mountain Association for Community Economic Development (MACED) and a former solar system installer. Mr. Bills has a long-standing special interest and a unique background of experience in the utilization of net metering to encourage deployment of distributed renewable energy, and was the person that installed the first net metering system in the Commonwealth of Kentucky on the Appalachia Science in the Public Interest office building in Mount Vernon. He resides at 1058 Big Hill Road in Berea, Madison County, Kentucky 40403.

4. This motion for full intervention is timely, within the meaning of 807 KAR 5:001 Section 3(8). The Commission Order entered on May 30, 2008 invited participation by individual or groups “with a special interest in net metering, either by intervening or filing suggested guidelines or comments[,]” and established a period of twenty days from the date of the Order in which motions for intervention should be filed. *This motion is filed within 20 days of the Order* and is thus timely.

5. No schedule has yet been established for the case, other than an informal conference on June 25, 2008. Mr. Bills will participate in that informal conference, so there is no prejudice to any party from the grant of full intervention rights to him.

6. The grant of intervention to a person pursuant to 807 KAR 5:001 Section 3(8) is within the sound discretion of the Commission, and requires that the person “specify his interest in the proceeding.”

7. As noted above, Joshua Bills is an energy specialist with MACED, the Mountain Association for Community Economic Development, which is a 31-year-old nonprofit organization that works in eastern Kentucky and Central Appalachia to create economic opportunity, strengthen democracy and support the sustainable use of natural resources. Mr. Bills, (who is intervening as an individual and not on behalf of MACED), is responsible for directing Energy Efficient Enterprises (E3), a program designed to enhance the financial strength of businesses and organizations and to benefit the natural environment by helping enterprises realize cost savings through the use of energy efficient equipment and systems or through renewable energy sources.

8. With rising energy prices, many companies are paying more for natural gas, propane and electricity. These vital inputs are cutting into profit margins and weakening the ability of businesses to invest in their futures. In addition, growing awareness of the effects of carbon dioxide on climate change has spurred many people to seek ways to reduce emissions through greater energy efficiency and the adoption of other energy sources such as wind, solar and low impact hydro-electric power. In response, the E3 program provides an on-site energy assessment, followed by recommendations for change and assistance with identifying and choosing an independent installation company. MACED provides financing for identified improvements at low rates and flexible terms for each enterprise.

9. Mr. Bills has extensive historical experience with net metering tariffs, and with the positive and negative aspects of the current tariffs, having intervened in the KU/LG&E pilot net metering tariff in 2002 and the Berea College Utilities net metering tariff

proposal in 2004. Additionally, he brings to this case his experience as a solar installer for the first net metering project in the Commonwealth.

10. Existing parties to the proceeding do not adequately represent the interests of Mr. Bills. No current party represents the specific interests of an energy specialist with first-hand experience in using the net metering interconnection process to connect a PV system to the grid, and with his experience of where the existing tariffs and procedures have and have not worked well. He also brings to the case the perspective of a non-profit economic development advisor specializing in use of renewable energy to strengthen the economic performance of businesses in the Appalachian region. The general statutory authority and interest of the Attorney General's office is distinct from the specific interests of Mr. Bills.

11. 807 KAR 5:001 Section 1(8)(b) provides in the alternative that the Commission shall grant full intervention status if the person "has a special interests in the proceeding which is not otherwise adequately represented" or "that full intervention by party (sic) is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings[.]" The special interests of Mr. Bills are directly germane to the subject matter of this proceeding and are not adequately represented, as discussed above. Alternatively, full intervention should be granted since his participation would assist the commission in fully considering the subject matter of this administrative case without unduly complicating or disrupting the proceeding.

WHEREFORE, for the reasons stated above, and because the special interests of Joshua Bills are not adequately represented by existing parties, and additionally in order to provide the Commission with information and direct experience that will assist the Commission in fully considering the interconnection and net metering issues raised by SB 83, Movant Joshua Bills requests that he be accorded the status of full Intervenor, and that each party to the case be directed to serve upon him and the undersigned counsel, all pleadings and information requests that are filed in this case.

Respectfully submitted,



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### **CERTIFICATE OF SERVICE**

I hereby certify that the original and 10 copies of this Motion have been filed with the Commission and that a true and correct copy of the Motion has been served by first-class mail upon the Service List by mailing same to the following individuals this 19th day of June, 2008:

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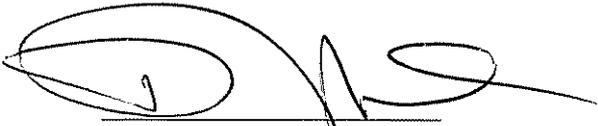
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