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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 SOLAR ENERGY SOLUTIONS LLC  
("SES") FOR FULL INTERVENTION**

Comes Solar Energy Solutions, LLC (SES), by counsel, and moves to intervene in the above-captioned proceeding as a full party. Pursuant to 807 KAR 5:001 Section 3(8), SES respectfully requests that it 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. Solar Energy Solutions, LLC (SES) is a for-profit limited liability company in good standing, organized under the laws of the Commonwealth of Kentucky, with its principal office at 5326 Paris Pike in Georgetown, Scott County, Kentucky, 40324. SES is dedicated to bringing renewable energy to Kentucky, and is a company that installs renewable energy products within Kentucky. Matt Partymiller, a Manager and Organizer of SES, at the above address, is a certified photovoltaic installer and active installer of grid-tie photovoltaic systems.

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. SES will participate in that informal conference, so there is no prejudice to any party from the grant of full intervention rights to SES.

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, SES is a for-profit business that installs renewable energy products and systems within the Commonwealth. As active installers of renewable energy products, SES is interested in promoting net metering standards

and interconnection guidelines that are fair and equitable for Kentucky residents and businesses and which will encourage greater utilization of renewable energy products and systems.

8. The North American Board of Certified Energy Practitioners (NABCEP) offers national credentialing and certifications to renewable energy professionals. The NABCEP PV (photovoltaic) installer certification is a voluntary certification that provides a set of national standards by which PV installers with skills and experience can distinguish themselves from their competition. Certification provides a measure of protection to the public by giving them a credential for judging the competency of practitioners. The NABCEP certification is intended for the person responsible for the system installation (e.g., contractor, foreman, supervisor, or journeyman). The NABCEP PV Installer certification has been developed in accordance with the certification field's best practices. NABCEP is a member of the National Organization for Competency Assurance (NOCA) and has endeavored to follow the requirements of ISO/IEC Standard 17024: General Requirements for Bodies Operating Certification Systems of Persons.

9. As a photovoltaic installer certified by NABCEP, and a firm active in installation of grid-tie PV systems, SES is current on grid-tie PV design and equipment capability issues.

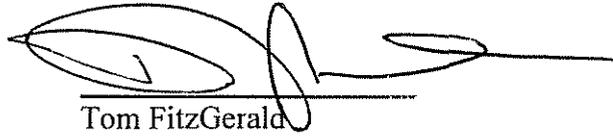
10. Existing parties to the proceeding do not adequately represent the interests of SES. No current party represents the specific interests of firms active in installation and design of grid-tie PV systems, and brings to this proceeding the knowledge and experience in best practices that attends a NABCEP certification. The general statutory

authority and interest of the Attorney General's office is distinct from the specific interests of SES.

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 SES 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 the participation of SES 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 SES 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 SES requests that it be accorded the status of full Intervenor, and that each party to the case be directed to serve upon Matt Partymiller as representative of SES, and the undersigned counsel, all pleadings and information requests that are filed in this case.

Respectfully submitted,



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Counsel for Movant for Intervention  
Solar Energy Solutions, LLC

### **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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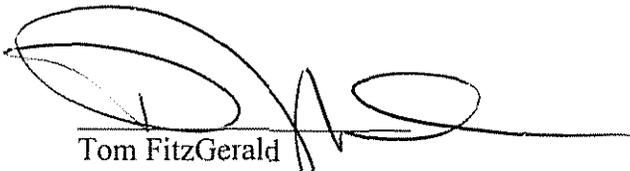
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