FILED

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BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION. PUBLIC SERVICE

COMMISSION

Docket No. 2021-AD-19

IN RE: ORDER ESTABLISHING DOCKET TO REVIEW THE EFFICACY AND FAIRNESS OF THE NET METERING AND INTERCONNECTION RULES

## **MOTION TO INTERVENE**

COMES NOW Scenic Hill Solar, LLC ("Scenic Hill Solar") pursuant to RP 6.121 of the Mississippi Public Service Commission's ("Commission") Public Utilities Rules of Practice and Procedure ("Rules") and hereby files this Motion to Intervene in the above-styled proceeding. In support thereof, Scenic Hill Solar submits the following:

- 1. Scenic Hill Solar is an Arkansas limited liability company based in Little Rock that is focused on the commercial solar market. It has developed a dozen solar facilities in Arkansas and continues to be a very active participant in Arkansas Public Service Commission ("PSC") Docket No. 16-027-R, regarding the establishment of net-metering rules. Scenic Hill Solar's familiarity with the Arkansas rules will provide a valuable perspective in the present docket.
- 2. Scenic Hill Solar has developed and is developing solar facilities for municipalities, school districts, private industry, hospitals, counties, and non-profits. To date, these facilities have primarily been in the one megawatt ("MW") range, while the largest is 6.5 MW. Most of these facilities are in the service territory of Entergy Arkansas, LLC ("EAL"), and therefore, Scenic Hill Solar is very familiar with EAL's interconnection processes.
- 3. Scenic Hill Solar intends to participate in the present docket to assure that Mississippi develops fair, efficient, and comprehensive net-metering and interconnection rules.

4. Scenic Hill Solar has a substantial interest in the Mississippi PSC's net metering and interconnection rules because it is considering expanding operations into Mississippi. The rules adopted in this proceeding will inform that decision.

5. The name and address of the person who is authorized to accept service of filings

on behalf of Scenic Hill Solar is:

Jason B. Keyes Keyes & Fox, LLP 580 California Street, 12th Floor San Francisco, CA 94104 Tel: (206) 919-4960 jkeyes@keyesfox.com

6. Scenic Hill Solar requests intervention as a full party of record, including the right

to present testimony and exhibits and to cross-examine witnesses. Scenic Hill Solar's rights and

interests in this matter will not adequately be represented by any other party, and its participation

will not unduly delay these proceedings.

WHEREFORE, Scenic Hill Solar respectfully requests that the Commission enter an

Order granting this Motion and allowing Scenic Hill Solar to become a full party of record in the

above-styled proceeding.

Respectfully submitted this 1st day of February, 2021.

fason B. Keyes

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Counsel to Scenic Hill Solar

## **CERTIFICATE OF SERVICE**

- I, Jason B. Keyes, do hereby certify that in compliance with RP 6.122(2) of the Rules:
- 1. An electronic copy of the filing has been filed with the Commission via e-mail to the following address: efile.psc@psc.state.ms.us.
- 2. An electronic copy of the filing has been served via e-mail to the following addresses:

Katherine Collier katherine.collier@psc.state.ms.us Sally Doty sally.doty@mpus.ms.gov Shawn S. Shurden <u>ssshurde@southemco.com</u> Bryan W. Estes chipestes@,email.com Hart Martin hart.martin@ago.ms.gov Stephen B. Jackson siackson@cooperativeenergy.com Alan Wilson awilson@cooperativeenergy.com Ryan Burrage ryan.bulTage@entegritypaltners.com Robert Wiygul robert@wwglaw.com Beth L. Orlansky borlansky@mscenterforjustice.org Randy E. Carroll RealToll@EMEPA.com Kacey Guy Bailey kacey@gloveryoung.com Stephen Wright swright@gsreia.org Larry D. Moffet larry@larrymoffett.com Paul Purnell <u>pumell@ecm.coop</u> Hunter Walters walters@ecm.coop William G. Giese wgiese@seia.org Beth Galante <u>bgalante@posigen.com</u>

This the 1st day of February, 2021.

Jason B. Keyes

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Counsel to Scenic Hill Solar