

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of The Commission's Review of)	
Chapter 4901:1-22, Ohio Administrative)	Case No. 12-2051-EL-ORD
Code, Regarding Interconnection Services.)	

**COMMENTS OF THE DAYTON POWER AND LIGHT COMPANY REGARDING THE
COMMISSION'S REVIEW OF CHAPTER 4901:1-22, OHIO ADMINISTRATIVE
CODE, REGARDING INTERCONNECTION SERVICES**

The Dayton Power and Light Company ("DP&L" or "the Company") appreciates the opportunity to provide comments in response to the entry dated October 17, 2012 in which the Public Utilities Commission of Ohio ("Commission" or "PUCO") solicited interested parties' comments on proposed changes relating to the Commission's interconnection services rules. The Commission solicited general comments on a few of the more significant recommended changes and policy questions as set forth in the entry itself, as well as invited feedback on the proposed changes to the text of the existing rules. DP&L's comments are set forth below.

I. GENERAL COMMENTS

A. Will the new three level process simplify and expedite the interconnection process (Entry, ¶8)?

DP&L is in favor of the new three level process; however, the Company would propose that the threshold for Level I be 25 kW, rather than the proposed 10kW. Many residential installations are above 10 kW. Subjecting residential applications to the Level II process would be lengthy, costly, and unnecessary.

B. Would a rule recognizing standard procedures for field-tested equipment quicken the review process? The EDU would maintain a database of field-tested equipment certified for use in its territory and make the database available to developers (Entry, ¶9).

DP&L reviews on the basis that any equipment that is UL 1741 certified is acceptable.

- C. Should the rules be revised to specify certain types of financial security instruments that could be posted by an applicant to guarantee that the EDU's interconnection-related costs are covered as they accrue? This would also describe the cost recovery procedure in the event that an application is terminated or withdrawn (Entry, ¶10).**

DP&L is supportive of such a provision, which would minimize financial risk to the utility, while ensuring the utility is made whole in the event the project which is subject to the interconnection terminates or is otherwise left unfinished. The utility should not bear the risk of the costs associated with incomplete projects - something falling entirely outside of the utility's control.

- D. Should the 20 MW limit be removed (Entry ¶11)?**

DP&L disagrees with the idea of removing the 20 MW limit. In general, most distribution circuits are rated for less than 20 MW. Any installation above 20 MW would most likely be interconnected at a transmission level, and would be subject to PJM interconnection procedures.

- E. Should the rules require that the interconnection queue be made publicly available? This could provide developers and EDUs with greater predictability regarding the feasibility and costs of interconnecting at a certain location (Entry, ¶12).**

The interconnection queue should not be made publicly available. This would raise concerns about customer privacy, particularly at the residential level. It is also unnecessary. Unlike the case with PJM, developers seeking to interconnect to the electric distribution system of the EDU are not usually doing so in an effort to relieve congestion, but instead want to connect their specific project to the grid.

II. TEXTUAL COMMENTS

- A. Threshold for Simplified Review**

As noted above, DP&L believes the threshold for simplified review should be 25 kW or lower, rather than Staff's proposed 10 kW threshold. DP&L would therefore propose making this change to the text in each instance in the proposed rules where the 10 kW threshold appears. [O.A.C. 4901:1-22-01(X); O.A.C. 4901:1-22-05(A)(1)(a); O.A.C. 4901:1-22-06(A)(a)(b)]

B. 4901:1-22-07 Level 2 Expedited Review Procedures

1. 22-07(B)(1)(d) Clarification

DP&L seeks clarification to the meaning of the term "line section" as set forth in section 22-07(B)(1)(d), and reproduced below:

The proposed distributed generation's capacity in aggregation with other generation on the circuit shall not exceed fifteen per cent of the total circuit peak load as most recently measured at the substation; nor will it exceed fifteen per cent of a **distribution circuit line section** annual peak load.

Specifically, does this refer to a fused line section, or a line section beyond a sectionalizing point, such as an air break switch?

2. 22-07(B)(1)(k)

Staff proposes increasing the threshold for aggregate generation capacity on a shared secondary line from 10 to 20 kW. DP&L proposes leaving the threshold at the 10 kW level, because it is unclear what impact such increase would have on its system.

3. 22-07(E) Supplemental Review

DP&L seeks clarification around the concept of the Level 2 supplemental review. Specifically, it is unclear from the proposed rule of the purpose of such review, when such review is required, what must be included in such review, the triggering event for the review, the number of supplemental reviews the customer may request, etc. Absent additional clarification, the requirements seems burdensome and unnecessary.

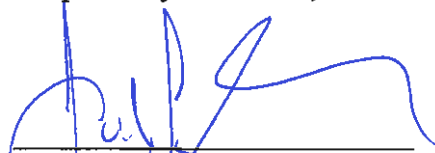
C. 4901:1-22-09(C)(1)(c) Error correction

To make it accurate, the reference to the "written agreement discussed in paragraph (D)(1)(b)" appearing in 22-09(C)(1)(c) should be changed as follows: "written agreement discussed in paragraph (D) (C)(1)(b)."

III. CONCLUSION

DP&L urges the Commission to adopt the changes proposed by DP&L and looks forward to receiving the clarification requested in the Commission's entry considering all interested parties' comments. As always, DP&L appreciates the opportunity to provide comments in connection with this five-year rule review.

Respectfully submitted,



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/19/2012 4:53:07 PM

in

Case No(s). 12-2051-EL-ORD

Summary: Comments on the Commission's Review of Chapter 4901:1-22, Ohio Administrative Code, Regarding Interconnection Service electronically filed by Eric R Brown on behalf of The Dayton Power and Light Company