

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

**REPLY COMMENTS OF INTERSTATE RENEWABLE ENERGY
COUNCIL, INC. ON PROPOSED MODIFICATIONS
TO INTERCONNECTION SERVICES AND STANDARDS**

Thadeus B. Culley
Keyes, Fox & Wiedman LLP
436 13th Street, Suite 1305
Oakland, CA 94612
510-314-8205
tculley@kfwlaw.com

On behalf of the Interstate Renewable
Energy Council, Inc.

December 4, 2012

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Pursuant to Rules of Administrative Provisions and Procedure, Chapter 4901:1-1, *et seq.*, Ohio Administrative Code (O.A.C.), and the Public Utilities Commission of Ohio's (Commission) Entry dated October 17, 2012, the Interstate Renewable Energy Council, Inc. (IREC) appreciates the opportunity to reply to opening comments submitted on the proposed rule changes to Chapter 4901:1-22, O.A.C. (Interconnection Rule).

IREC replies here on three issues raised by other parties:

- **Raising Level 1 eligibility to 25 kW or less.** IREC supports the comments of Ohio Power Company (Ohio Power), Dayton Power & Light Company (DP&L), and Office of the Ohio Consumers' Counsel (OCC) to increase the eligibility size for Level 1 interconnection review to 25 kW or less.
- **Clarifying Level 1 and Level 2 approval criteria language.** IREC agrees with Ohio Power and DP&L that the approval criteria language in Sections 4901:1-22-06(B)(1)(b) and 4901:1-22-07(B)(1)(d) could be improved and clarified. To accomplish this, IREC suggests adopting Section 2.2.1.2 of the Federal Energy Regulatory Commission's (FERC) Small Generator Interconnection Procedures (SGIP).
- **Providing public access to queue data.** In regards to public access to queue data, IREC agrees with OCC and Interstate Gas Supply (IGS) that basic queue data should not reveal confidential customer information.

I. Raising Level 1 Eligibility to 25 kW or Less Is Consistent with Best Practices and Will Reduce the Application Processing Cost for Both Utilities and Customers.

IREC supports the comments of Ohio Power, DP&L, and OCC proposing an increase in Level 1 eligibility from 10 kW or less to 25 kW or less for inverter-based generators. The primary benefits of Ohio's current Level 1 process are a reduced cost and the ability to submit a relatively short, combined application and interconnection agreement. These benefits accrue to both (a) customers installing small, inverter-based systems, through reduced application times, and (b) utilities, through the reduction in administrative time spent processing a separate interconnection agreement. Raising the Level 1 cap to 25 kW will expedite the process for an even larger portion of customers and in doing so reduce the application processing cost for both utilities and customers.¹

Although a number of states and SGIP feature a 10 kW inverter-based process, several states have recently expanded this quick, inexpensive, and user-friendly interconnection to generators of larger sizes. For example, Oregon, Massachusetts, and West Virginia² provide a simplified process for inverter-based systems 25 kW or less. In addition, the Washington Utilities and Transportation Commission recently proposed a simplified process for inverter-based generators 25 kW or less.³ Accordingly, IREC agrees with Ohio Power, DP&L, and OCC that it makes sense to ensure administrative ease in the interconnection of generators up to 25 kW.

¹ See OCC comments at p. 3, Ohio Power comments at pp.1-2, DP&L comments at p. 3.

² In 2010, the West Virginia Public Service Commission adopted a Level 1 interconnection process for inverter-based systems up to 25 kW that was based on IREC's Model Interconnection Procedures. IREC's Model Interconnection Procedures, 2009 edition, are available at <http://irecusa.org/wp.../IREC-Interconnection-Procedures-2010final.pdf>.

³ See *Notice of Opportunity to Submit Written Comments on Interconnection Draft Rules*, UTC Docket No. UE-112133 (November 2012).

II. Making Sections 4901:1-22-06(B)(1)(b) and 4901:1-22-07(B)(1)(d) Consistent with SGIP Screen 2.2.1.2 Will Improve Clarity for Utilities and Developers.

DP&L and Ohio Power highlighted in opening comments⁴ that the current technical screens leave room for clarification regarding the allowable level of aggregate generation on a portion of the distribution grid, which level varies depending on whether an applicant makes a Level 1 or a Level 2 interconnection request.⁵ To remedy this, IREC proposes adopting the present SGIP screen language for both Level 1 and Level 2 review to clarify the rules and provide for consistent application by basing the aggregate generation limit on the peak load of a line section, as measured at the substation. Adopting SGIP Section 2.2.1.2⁶ will make Ohio rules consistent with FERC-jurisdictional procedures in use in Ohio. IREC noted in its opening comments that utilities providing FERC-jurisdictional transmission service are familiar with SGIP and developers, which often operate in multiple states, are familiar with SGIP because it has informed many states' interconnection procedures. IREC supports greater compatibility between Ohio's technical screening process and that of SGIP and encourages the Commission to Make Sections 4901:1-22-06(B)(1)(b) and 4901:1-22-07(B)(1)(d) consistent with SGIP Screen 2.2.1.2.

⁴ See Ohio Power comments at pp. 2-3; DP&L comments at p. 3.

⁵ For example, the Level 1 screen provides that "aggregate generation on the circuit . . . may not exceed fifteen per cent of the peak load on the smallest part of the primary distribution system that could remain connected after operation of sectionalizing devices." 4901:1-22-06(B)(1)(b). The Level 2 screen, on the other hand, measures this 15 percent limit based on the "total circuit peak load" and the "distribution circuit line section annual peak load." 4901:1-22-07(B)(1)(d).

⁶ SGIP § 2.2.1.2: "For interconnection of a proposed Small Generating Facility to a radial distribution circuit, the aggregated generation, including the proposed Small Generating Facility, on the circuit shall not exceed 15 % of the line section annual peak load as most recently measured at the substation. A line section is that portion of a Transmission Provider's electric system connected to a customer bounded by automatic sectionalizing devices or the end of the distribution line."


III. Increased Access to Queue Data Can Be Accomplished Without Compromising Customer Confidentiality Concerns.

IREC continues to support making queue data publicly available and agrees with the comments of OCC and Interstate Gas Supply, Inc. that such data could aid developers. IREC also understands the confidentiality and administrative concerns of utilities in providing this data, but agrees with IGS that basic queue data—which is required disclosure for all FERC-jurisdictional interconnections—does not pose a confidentiality concern.

V. Conclusion

IREC appreciates the opportunity to submit these reply comments. IREC encourages the Commission to raise the eligibility limit of Level 1 interconnection review to 25 kW or less and adopt the technical screen language used in SGIP § 2.2.1.2 to screen for fast track eligibility.

Respectfully submitted on December 4, 2012,



Thadeus B. Culley
Keyes, Fox & Wiedman LLP
436 13th Street, Suite 1305
Oakland, CA 94612
510-314-8205
tculley@kfwlaw.com

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Summary: Reply Reply Comments of Interstate Renewable Energy Council, Inc. on Proposed Modifications to Interconnection Services and Standards electronically filed by Mr. Thad B Culley on behalf of Interstate Renewable Energy Council, Inc.