

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of)
Chapter 4901:1-11, Ohio Administrative) Case No. 12-2051-EL-ORD
Code, Regarding Interconnection Services.)

COMMENTS OF DUKE ENERGY OHIO, INC.

Duke Energy Ohio, Inc. (Duke Energy Ohio) submits the following comments in response to the Public Utilities Commission of Ohio (Commission) request for comments related to proposed changes to Chapter 4901:1-22, Interconnection Services.

4901:1-22-01 Definitions.

With respect to the various processes, it was thought that the process for using the Short Form Application for Interconnection plus an approval letter versus using the Standard Application for Interconnection plus the Standard Interconnection agreement was not required to correspond with Levels 1, 2 and 3. Duke Energy Ohio has allowed the Short Form for customer-generators using UL 1741-certified inverters of 50 kW or less. Even if the customer's total was greater than 50 kW, if the individual inverters were rated 50 kW or less, Duke Energy Ohio allowed the customer-generator to interconnect using the Short Form Application plus Approval Letter process. Therefore, in order to keep the process as streamlined as possible, Duke Energy Ohio suggests definition (X) of the rule to read as:

(X) “Simplified procedures” mean a review process for interconnection of distributed generation ten kilowatts or less in size on a radial or spot network, or UL-certified inverters of 50 kilowatts or less in size.

4901:1-22-05 Application requirements for interconnection.

Duke Energy Ohio recommends that the Commission keep the existing process of allowing the short form application for customer-generators with UL 1741-certified inverters of 50 kW or less. If a customer-generator’s system is of a design which uses equipment that has been rigorously tested to accepted industry standards, and the customer-generator’s proposed system passes the other screens for systems or its size, it is burdensome on both the customer-generator and the utility to have to issue a detailed interconnection agreement. Therefore, and again to keep the transaction as simple as possible in order to encourage customers, Duke Energy Ohio proposes the following language:

(A)(1)(a) A “short form” application for interconnection of generating equipment ten kilowatts or less, or for UL 1741-certified inverter-based equipment fifty kilowatts or less.

4901:1-22-06 Level 1 simplified review procedure.

Duke Energy Ohio respectfully disagrees with shortening the length of time for processing of Level 1 applications. The volume of applicants continues to increase every year, and the increase in interconnection requests is significant. It is illogical under these circumstances to give the electric distribution utility (EDU) less time to process the application.

Duke Energy Ohio also notes that providing customers with notification copies of the analysis and data of the utility's determinations would be unnecessary and burdensome.

Therefore Duke Energy Ohio proposes the following language:

(C)(1) Within twenty business days after the EDU notifies the applicant that it has received a complete short form interconnection service application, the EDU shall perform a review using the criteria set for the (B) (1) of this rule and shall notify the applicants of the results.

4901:1-22-06 Level 1 simplified review procedure.

Duke Energy Ohio proposes the following language in order to allow for flexibility in dealing with customers:

(D)(1) The EDU's tariff for a level 1 fee will be fifty dollars. The fee may be waived in accordance with the EDU's procedures.

4901:1-22-07 Level 2 expedited review procedure

Duke Energy Ohio requests that clarification be made to the section on the aggregated limit for distributed generators in order to take into account the level of distribution voltage. The proposed ten megawatt limit could not easily be accommodated on a 12 kV feeder and therefore should not qualify for expedited review. Duke Energy Ohio suggests that limits in section (B)(1)(c) be scaled according to the level of distribution voltage.

Duke Energy Ohio's General Comments Section

Duke Energy Ohio, submits the following in response to the Commission's specific questions raised in its Entry in paragraphs preceding the proposed rules. Paragraph references are to those in the Entry.

Paragraph Number 8.

Duke Energy Ohio would prefer to retain the ability to use the Short Form Application/Approval process for Level 2 installations where the distributed generators are UL 1741-certified generators rated fifty kilowatts or less. Though it may seem simpler in writing the rule to allow this process only for Level 1 interconnections, in practice this creates additional paperwork for both the customer and the EDU, and slows down the interconnection process for both the customer and the Company.

Paragraph Number 9.

Duke Energy Ohio respectfully disagrees with the idea that interconnection equipment can be considered field-tested if the utility has previously approved interconnection equipment that is identical to the interconnection equipment being proposed. A distributed generator at one location under a certain set of system conditions may pass commissioning tests but the same generator at another location under a different set of system conditions may not. It is too great a simplification to try to generalize field testing from one installation to another.

Paragraph Number 10.

Duke Energy Ohio is not opposed to a uniform process for minimizing financial risk but recommends that this framework be kept as simple and straightforward as possible.

Paragraph Number 11.

Duke Energy Ohio does not see the need to remove the current limit for generating facilities interconnected at a distribution level and thus recommends no changes here.

Paragraph Number 12.

Duke Energy Ohio does not support making the distribution interconnection queue public. The feasibility and costs of interconnecting can better be addressed through the current Level 3 process. It may be possible to provide proposed distributed generators some preliminary basic information in order to inform and facilitate the transaction.

Respectfully submitted,

A handwritten signature in blue ink that reads "Elizabeth H. Watts" with a stylized flourish at the end.

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Summary: Comments of Duke Energy Ohio, Inc. electronically filed by Dianne Kuhnell on behalf of Duke Energy Ohio, Inc. and Spiller, Amy B. and Watts, Elizabeth H.