

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)
Review of Chapter 4901:1-10, Ohio) Case No. 12-2050-EL-ORD
Administrative Code, Regarding)
Electric Companies.)

**COMMENTS OF BUCKEYE FOREST COUNCIL AND THE OHIO
ENVIRONMENTAL COUNCIL REGARDING THE COMMISSION’S REVIEW OF
O.A.C. § 4901:1-10-31**

January 7, 2013

The following comments address current O.A.C. § 4901:1-10-31, “Environmental disclosure,” and the Commission’s proposed changes thereto.

I. The Proposed Regional Mix Supplementation Should be Expressly Limited to Unknown Mix Purchases.

The undersigned parties agree that supplementing the regional generation resource mix for “unknown purchased resources” will provide customers with a better approximation of the generation resource mix being supplied.

However, the undersigned believe that proposed 4901:1-10-31(C)(2)(c) should be clarified to ensure that the regional generation resource mix is used only to represent purchased energy of unknown resource mix. On its face, proposed (C)(2)(c) currently appears to mandate reporting of the regional mix for any and all purchased energy, regardless of whether or not the resource mix of the purchased energy is actually known by the electric utility:

When calculating the generation resource mix, the electric utility shall assume that purchased energy has the same generation resource mix as the regional generation resource mix for the twelve month period of June 1 to May 31, as provided by the electric utility's regional transmission organization or independent system operator.

Proposed O.A.C. 4901:1-10-31(C)(2)(c) (emphasis added). The undersigned suggest that the proposed rule clarify that the regional resource generation mix is to be used only in cases of unknown-resource-mix purchases, and that the regional mix may not be used where the purchased generation mix is known to the electric utility.

II. Biomass Power Mix Disclosure Should be at least as Transparent as (GATS) or EIA Categories.

The undersigned parties recommend that O.A.C. 4901:1-10 be amended to require disclosure by type of biomass fuel, in the same or similar fashion as that used by the Generation Tracking Attribute System (GATS). Unlike the other generation resources enumerated in 4901:1-10-31(C)(1)(a), “biomass power” is comprised of several different fuel types that may have differing emissions profiles and environmental characteristics. Requiring the disclosure of biomass mix in place of the current, opaque “biomass power” category would provide customers with a much more accurate and transparent approximation of the generation resource mix being supplied.

Moreover, fuller public disclosure is easily achievable. For example, the Generation Tracking Attribute System (GATS) tracks and discloses biomass resource mix under at least eight separate categories:

- Wood: Black Liquor
- Wood: Paper Pellets, Railroad Ties, Utility Poles, Wood Chips, and other wood solids
- Wood: Red Liquor, Sludge Wood, Spent Sulfite Liquor, and other wood related liquids not specified
- Other Biomass: Digester Gas, Methane, and other biomass gases
- Other Biomass: Ethanol, Fish Oil, Liquid Acetonitrile Waste, Medical Waste, Tall Oil, Waste Alcohol, and other biomass liquids not specified
- Other Biomass: Both Animal Manure and Waste, Solid Byproducts, and other solid biomass not specified
- Other Biomass: Sludge Waste
- Solid Waste: Municipal Solid Waste¹

In addition, the U.S. Energy Information Administration (EIA) tracks state-by state biomass mix generation under at least two separate categories: “Wood and Wood Derived Fuels” and “Other Biomass.”² The EIA biomass tracking categories would therefore also provide more transparency than the current rule.

The undersigned recommend that biomass mix be categorized and disclosed to the public via categories similar to those of GATS and/or the EIA. The Commission may wish to consider requiring a new, additional pie chart that breaks down the resource subset of “biomass power” into its constituent parts. Again, because biomass mix by type is currently tracked by GATS and EIA, electric utilities should not find similarly transparent biomass mix disclosure requirements to be burdensome.

¹ See, e.g., <https://gats.pjm-eis.com/myModule/rpt/myrpt.asp?r=240&TabName=Certificate> (GATS database tracking “Number of Certificates by Fuel”); <https://gats.pjm-eis.com/myModule/rpt/myrpt.asp?r=243> (GATS Database tracking “PJM System Mix”).

² See, e.g., “1990 - 2011 Net Generation by State by Type of Producer by Energy Source (EIA-906, EIA-920, and EIA-923)”; available at: <http://www.eia.gov/electricity/data/state/>.

III. Disclosure of Sustainable Forest Management Operations Should be Required for Forest Resource Biomass Fuel Sources.

In the “Green Rules Case,” (08-888-EL-ORD), the Commission addressed environmental concerns associated with forest resource-based biomass by stating that the Commission “conditions the use of forest resources [as biomass fuel] upon sustainable forest management operations.”³ The undersigned parties recommend that O.A.C. 4901:1-10 be amended to require public disclosure of timber sustainability certification (or the lack thereof) – and/or other applicable documentation of sustainable forest management operations – where forest resources are used for biomass power generation.

Sincerely,



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³ “Green Rules Case,” (08-888-EL-ORD), Finding and Order at 26 (April 15, 2009).

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Summary: Comments Regarding Environmental Disclosure, Section 4901:1-10-31
electronically filed by Mr. Nathan G. Johnson on behalf of Buckeye Forest Council and The
Ohio Environmental Council