FILE

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12-2050-EL-ORD

Related Case Number: 12-2050

TYPE: comment

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INDUSTRY:Electric

ACCOUNT INFORMATION:

- Company: Conserve First LLC
- Name on account: N/A
- Service address: N/A
- Service phone: N/A
- Account Number: N/A

COMMENT DESCRIPTION:

Re: Case No. 12-2050-EL-ORD

• Net Metering: While we generally support the proposed changes in clarification and the comments submitted by entities such as The Ohio Farm Bureau, as submitted 1-7-2013 and by Gem Energy as submitted 1-4-2012, we would like to see further improvements where the full

value, not just the generation portion, of any surplus power generated at a site in a given period can be banked for use during any other part of the year as a credit on the property owner's electric bill. Distributed generation projects power, even if temporally generated at a surplus is used locally and thus does not use the full utilities infrastructure or incur the full transmission losses and thus on net, should be credited at or closer to the full retail rate the customer would pay. Further, while the customer generator definition improvements are appreciated, consideration should be given to allow for over-generation in excess of 120%. The rationale for this request is based on the realities of the marketplace for mid-sized distributed generation wind turbines and their associated economics. While the intent of a site owner may be to just offset their power, these realities may force them into a larger machine than their initial intent. Meeting 100% or 120% offset may make project impossible or financially impractical. While we agree in the 120% in principle, we would like to see a simple path for exceptions to this rule based on market and true economics viability. We would support any actual realized over-generation in this scenario being credited at a true value utility offset rate, generation cost plus a portion of or actual transmission and other utility realized costs.

• PURPA Compliance: No Comment at this time

• Customer Protections: We support these further protection clarifications and would concur with the general statements of entities such as The Ohio Farm Bureau, as submitted 1-7-2013.

• Environmental Disclosures: We support these further protection clarifications and would concur with the general statements of entities such as The Ohio Farm Bureau, as submitted 1-7-2013.

• Aggregation of Projects We support these further protection clarifications and would generally concur with the statements of entities such as The Ohio Farm Bureau, as submitted 1-7-2013 and by Gem Energy as submitted 1-4-2012, but would add the following additions: Strong considerations need to be given to facilitating the most efficient use of resources (over multiple meters for a single owner, over multiple owners and over multiple locations). While important for many businesses, this is especially important for schools, parks, municipalities and other not-for-profits in direct interest and public interest that may have multiple locations, but a single optimal location for renewable energy installations. This could also likely benefit the utilities as it could better allow for more optimum single installation locations on their grids instead of multiple smaller locations. Further, it would allow for more efficient sizing of projects and their related infrastructure at the optimal locations in relationship to the natural resources. In practice, this would just require utility accounting and billing aggregation. Ideally, long-term, we would like to see this aggregation ability go beyond a single owner, but realize this may be difficult at this time. This said, this practice would be directly in alignment with the original legislations intent.

Other issues For Consideration: • Utility Power Quality Issues - Utilities need to be held accountable for the same standards they hold projects to. If a project is forced to shut down due to a utility grid power issue, not a customer generator issue, resulting in lost savings for the project, the utility needs to be held accountable for these losses. Acts of nature aside, many of these triggered "faults" are caused by fluctuations in the grid and have nothing to do with the customer generation, but still result in significant lost savings and additional customer costs associated with equipment resets requiring qualified personnel review. Further, the way the shut-

downs are forced is very hard on the renewable generation equipment (especially wind turbines), essentially forcing an emergency stop for all conditions. A better approach would to be to allow for standard slightly slower stop sequences for all but true emergency situations (still occurs in seconds). • Demand and Standby Charges – Need to be Thoroughly Reviewed as they apply to net-metered distributed generation projects. Distributed generation can actually help with overall grid peak demands especially at the current low concentrations of renewables on the grid. Also, especially for schools, yearly peak demands do not always follow the rest of the grid.

• In general, the utility and PUCO rules governing net-metering need to be evaluated to remove excessive impediments, processes, delays and costs, especially as related to mid-sized wind turbines and smart-metered locations. While the intent of these rules are well founded, the in-practice reality is that their implementation represent a significant portion of a project's overall budget, especially for mid-sized wind projects.

• In addition, if the utilities require integration and testing plans, they should have to provide preapproved templates.