

**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.)
)

**SUPPLEMENTAL COMMENTS
BY THE
OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

By Entry dated January 16, 2013, the Public Utilities Commission of Ohio (“PUCO”) requested supplemental comments concerning the PUCO Staff’s proposal for further changes to rules that address how Ohioans can connect their distributed generation (e.g., windmills) to the power grid.¹ The Office of the Ohio Consumers’ Counsel (“OCC”) welcomes the opportunity to offer these comments on behalf of all of the 4.2 million residential customers of Ohio electric distribution utilities (“EDUs”). OCC commends the PUCO Staff for carefully reviewing the comments and reply comments of interested parties in this case and, based on those comments, proposing additional modifications to the interconnection rules to make the process more efficient, transparent, and accountable for the public.

OCC is generally supportive of the proposed rules, which will tend to impact larger non-residential projects requiring Level 2 review and above. The proposed modifications are:

¹ Ohio Adm. Code Chapter 4901:1-22 (Interconnection Services).

1. Scaling of capacity as a new method for Level 2 Expedited Review
2. Incorporating Language from Federal Energy Regulatory Commission's
 Small Generator Interconnection Procedures ("SGIP")
3. Three Additional Screens for Projects that Fail Level 2 Expedited Review
4. Pre-Application Report to Promote Information Accessibility
5. Modifying a Technical Screen to improve its ability to identify generators
 in need of full study
6. Modifying a Technical Screen to Identify high-risk interconnection
 requests

The Commission is also requesting supplemental comments related to backup electricity supply for partial-service non-residential customers. (Partial-service consists of Backup Reservation Service and Scheduled Maintenance Service where the utility reserves capacity for a customer to replace capacity normally provided by the customer's on-site generating facilities.) While OCC is supportive of the general intent of the PUCO Staff recommendations outlined above, and the inquiries into standby service, OCC reserves comment at this time. OCC looks forward to reviewing the supplemental comments of other parties. OCC reserves its right to file supplemental reply comments on February 7, 2013.

Respectfully submitted,

BRUCE J. WESTON
OHIO CONSUMERS' COUNSEL

/s/ *Melissa R. Yost*

Melissa R. Yost, Counsel of Record
Deputy Consumers' Counsel

Office of the Ohio Consumers' Counsel

10 West Broad Street, Suite 1800

Columbus, Ohio 43215-3485

(614) 466-1291 – Telephone (Yost)

yost@occ.state.oh.us

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Supplemental Comments upon the following via electric transmission, this 31st day of January 2013.

/s/ Melissa R. Yost

Melissa R. Yost

Deputy Consumers' Counsel

SERVICE LIST

J. Thomas Siwo
Matthew W. Warnock
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
tsiwo@bricker.com
mwarnock@bricker.com

Scotte Elliott, MSEE, CEM
Metro CD Engineering, LLC
7003 Post Road, Suite 204
Dublin, Ohio 43016
selliott@metrocdengineering.com

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

Janice Karlak
4547 East Livingston Avenue
Columbus, Ohio 43227
jankarlak@yahoo.com

Amy B. Spiller
Elizabeth H. Watts
Duke Energy Business Services LLC
139 East Fourth Street, 1303-Main
PO Box 960
Cincinnati, Ohio 45201-0960
Amy.spiller@duke-energy.com
Elizabeth.watts@duke-energy.com

James W. Burk (0043808)
Counsel of Record
FirstEnergy Corporation
76 South Main Street
Akron, Ohio 44308
burkj@firstenergycorp.com

Steven T. Nourse
American Electric Power Service Corp.
1 Riverside Plaza 29th Floor
Columbus, Ohio 43215
stnourse@aep.com

Samuel C. Randazzo
Scott Elisar
McNees Wallace & Nurick LLC
21 East State Street, Suite 1700
Columbus, Ohio 43215-4228
sam@mwncmh.com
selisar@mwncmh.com

Judi L. Sobecki
Randall V. Griffin
The Dayton Power and Light Company
1065 Woodman Drive
Dayton, Ohio 45432
Judi.sobecki@DPLINC.com

Vincent Parisi
Matthew White
Interstate Gas Supply, Inc.
6100 Emerald Parkway
Dublin, Ohio 43016
vparisi@igsenergy.com
mwhite@igsenergy.com

David R. Blair, P.E.
GEM/Energy
5505 Valley Belt Road, Suite F
Independence, Ohio 44131

Richard Munson
Recycled Energy Development
640 Quail Ridge Drive
Westmont, Illinois 60559

Lance S. Traves
President
Labyrinth Management Group, Inc.
239 South Court Street
Medina, Ohio 44256

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/31/2013 11:41:30 AM

in

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

Summary: Comments Supplemental Comments by the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Yost, Melissa Ms.