

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)	

**SUPPLEMENTAL COMMENTS OF THE INTERSTATE RENEWABLE
ENERGY COUNCIL, INC. ON STAFF'S FURTHER PROPOSED MODIFICATIONS
TO INTERCONNECTION SERVICES AND STANDARDS**

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On behalf of the Interstate Renewable
Energy Council, Inc.

January 31, 2013

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Pursuant to Rules of Administrative Provisions and Procedure, Chapter 4901-1, *et seq.*, Ohio Administrative Code (O.A.C.), and the Public Utilities Commission of Ohio's (Commission) Entry dated January 16, 2013, the Interstate Renewable Energy Council, Inc. (IREC) respectfully submits these supplemental comments on the Staff's further proposed rule modifications to Chapter 4901:1-22, O.A.C. (Interconnection Rule).

IREC generally supports Staff's proposed modifications put forward in the January 16, 2013 Entry, and specifically highlights the following as significant improvements: (1) modifications to eligibility criteria for Level 2 interconnection review; (2) a more defined Level 2 supplemental review process with additional technical review screens; (3) a pre-application report option for prospective interconnection customers; (4) a generation capacity limit on a single phased shared secondary set at 65% of transformer nameplate rating instead of the existing static 10 kW limit; and (5) a requirement for additional study when the proposed generator has interdependencies with other queued generators on the transmission or sub-transmission system

or if there are posted transient stability issues.¹ IREC takes no position at this time regarding Staff's questions regarding standby tariffs and focuses its comments below on proposals to modify Level 2 eligibility and the supplemental review process.

As noted above, IREC supports Staff's proposal to scale Level 2 eligibility based on generator capacity and relevant characteristics at the point of interconnection, such as voltage level of the distribution circuit and distance between the proposed generator and the substation. IREC believes Staff's proposed Level 2 eligibility criteria are appropriately based on individual system and generator characteristics that will allow the proposed approach to accommodate a variety of operating practices and electric system characteristics while also maintaining safety and reliability. As the January 16, 2013 Entry notes, "[g]enerators proximate to their local substation on a main distribution line are less likely to create impacts justifying detailed study than generators located at the end of a long distribution line."² IREC agrees and notes that Staff's proposal is supported by a recent technical report³ published by the National Renewable Energy Laboratory and reflects an approach put forward in a recently issued Notice of Proposed Rulemaking by the Federal Energy Regulatory Commission (FERC).⁴ IREC proposes no modifications to the proposed table put forward on page 2 of the January 16, 2013 Entry.

¹ IREC suggests, however, that a 10 MW aggregate capacity limit, as embodied in Section 2.2.1.9 of the Federal Energy Regulatory Commission's (FERC) Small Generator Interconnection Procedures (SGIP), is not necessary to address transient stability issues and suggests that "known or posted transient stability limitations" should refer only to such limitations that are documented and posted by the ISO.

² January 16, 2013 Entry at p. 2.

³ Kevin Fox, Sky Stanfield, Laurel Varnado, Thad Culley, Michael Sheehan, and Michael Coddington, *Updating Small Generator Interconnection Procedures for New Market Conditions*, NREL/TP-5500-56790, at pp. 19-21 (December 2012), available at www.nrel.gov/docs/fy13osti/56790.pdf.

⁴ *Small Generator Interconnection Agreements and Procedures* (Notice of Proposed Rulemaking), 142 FERC ¶ 61,049 (January 17, 2013), available at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13155520>.

IREC also supports Staff's proposal to more clearly define the technical considerations addressed in the supplemental review process. As the Entry notes, "[t]he purpose of supplemental review is to provide additional time for utilities to address any easily identifiable issues impacting the safe and reliable interconnection of a generator that can be determined without Level 3 Standard Review."⁵ IREC believes the three additional technical screens proposed by Staff will guide utility review of proposed interconnections that may fail one or more of the initial Level 2 expedited criteria but may nevertheless not require a full Level 3 Standard Review. The technical review screens proposed by Staff are consistent with reforms implemented in California⁶ and proposed in Hawaii⁷ and at FERC⁸. The benefits and rationale underlying these screens have also been supported in recent publications.⁹ In sum, Staff's proposed supplemental review modifications will offer additional time to remedy any problems identified by the initial technical review screens while providing an opportunity to avoid the more costly and time-intensive Level 3 study process.

IREC believes assessing a flat, non-refundable fee for supplemental review will

⁵ January 16, 2013 Entry at p. 3.

⁶ CPUC Decision 12-09-018 at 25 ("In establishing this second screen [100% of minimum load on a line section] in Supplemental Review, which permits higher penetration levels of distributed generation without significantly increasing the time or expense of the interconnection process, the Proposed Settlement responds to identified concerns and, as such, is reasonable in light of the record.").

⁷ See "Reliability Standards Working Group Independent Facilitator's Submittal: Progress Report, RSWG Work Product Submittal," at pp. 50-54 (of .pdf document), filed in Hawaii Public Utility Commission Docket No. 2011-0206 on December 24, 2012. The document is available on the Hawaii Commission's DMS website, at <http://dms.puc.hawaii.gov/dms/DocketSearch>.

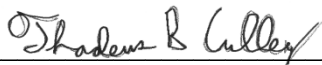
⁸ *Notice of Proposed Rulemaking*, 142 FERC ¶ 61,049 at ¶¶ 35-40.

⁹ See, e.g., Michael Coddington *et al.*, *Updating Interconnection Screens for PV System Integration*, NREL/TP-5500-54063 (January 2012); *Updating Small Generator Interconnection Procedures for New Market Conditions*, *supra*, footnote 3.

maximize cost certainty for applicants and maintain the expedited nature of Level 2 review by avoiding the need to determine and communicate an estimated cost to applicants, which may prompt negotiation and dispute over estimated amounts, thereby slowing the process of completing a Level 2 (“Fast Track”) review.

For the reasons stated above, IREC supports: (1) modifications to eligibility criteria for Level 2 interconnection review; (2) a more defined Level 2 supplemental review process with additional technical review screens; (3) a pre-application report option for prospective interconnection customers; (4) a generation capacity limit on a single phased shared secondary set at 65% of transformer nameplate rating instead of the existing static 10 kW limit; and (5) a requirement for additional study when the proposed generator has interdependencies with other queued generators on the transmission or sub-transmission system. IREC takes no position at this time regarding Staff’s questions regarding standby tariffs but reserves the right to respond to parties’ proposals in submitting reply comments.

Respectfully submitted on January 31, 2013,



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Summary: Comments SUPPLEMENTAL COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC. ON STAFF'S FURTHER PROPOSED MODIFICATIONS TO INTERCONNECTION SERVICES AND STANDARDS
electronically filed by Mr. Thad B Culley on behalf of Interstate Renewable Energy Council, Inc.