

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

measures at a facility. Second, as the OMAEG discussed in its Initial Comments, manufacturers' annual energy consumption can vary significantly from year to year. In the event of even a mild economic downturn, a manufacturer would be more likely to be improperly classified as an excessive generator by AEP-Ohio's definition. Therefore, the Commission should reject AEP-Ohio's suggestion.

B. 4901:1-10-28(A)(4) Net Metering – Microturbine.

The OMAEG respectfully disagrees with Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company's (collectively, "FirstEnergy") proposed cap of 500 kW in defining a "microturbine".² Net metering is an important mechanism for encouraging distributed generation, including combined heat and power ("CHP"). It is unlikely that a microturbine, or any other combustion-based generator, could be utilized economically without capturing the waste-heat for a useful purpose. Thus, most combustion-based generators utilizing net metering will be CHP systems. Further, it is possible that many mid-size manufacturers with properly sized CHP systems would have combustion-based generators or microturbines greater than 500 kW. These same systems would likely be sized to the process heat load of the manufacturer, and could under or over-generate electricity in different months, based on production demands instead of weather. Therefore, it is quite likely that mid-sized manufacturers would utilize a net-metering tariff rather than a standby services tariff. A 500 kW cap may discourage mid-sized manufacturers from implementing CHP; thus, the Commission should reject FirstEnergy's suggestion.

² See FirstEnergy Comments at 17-18.

C. Additional Comments.

Several parties address roll-over credits versus monetary credits, and virtual net-metering in some capacity. The OMAEG supports the monthly roll-over of a kWh credit, rather than a monetary credit. Also, the OMAEG remains supportive of its Initial Comments filed in this proceeding regarding virtual net metering in situations where aggregated facilities are in close proximity to each other. For example, many manufacturers are good candidates for CHP systems because they have several buildings and electrical accounts on contiguous property. However, the heat load that a CHP system would serve must be extended across these buildings, and the corresponding electrical generation could in some cases exceed the load of one building. Therefore, in order to take full advantage of a CHP system without virtual net-metering would require manufacturers to build separate, redundant electrical lines to connect the buildings to one meter and account. Many times, this extra cost creates an additional financial obstacle to adoption of CHP. For this reason, the OMAEG supports virtual net metering where buildings are in close proximity to each other.

III. CONCLUSION

The OMAEG remains supportive of its Initial Comments filed on January 7, 2013 in this proceeding, and respectfully requests the Commission to consider and adopt its recommendations provided in its Initial and Reply Comments.

Respectfully submitted on behalf of
THE OMA ENERGY GROUP



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply Comments of the OMA Energy Group was served upon the parties listed below this 6th day of February 2013 via electronic mail.



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