

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**REPLY COMMENTS OF IGS SOLAR, LLC, IGS GENERATION, LLC, AND
INTERSTATE GAS SUPPLY, INC.**

I. INTRODUCTION

On November 18, 2015, the Public Utilities Commission of Ohio (“Commission”) solicited for comment draft net metering rules. As noted in their initial comments, IGS Solar, LLC, IGS Generation, LLC, and Interstate Gas Supply, Inc. (collectively, “IGS”) largely supports the draft rules. IGS hereby responds to the initial comments submitted by Ohio Power Company (“AEP”), Ohio Edison Company, Toledo Edison Company, and Cleveland Electric Illuminating Company (collectively, “FirstEnergy”), and Duke Energy Ohio (“Duke”), and Dayton Power and Light (“DP&L”), each of those parties propose modifications to the proposed rules, which would frustrate the development of distributed generation resources.

While IGS does not respond to each of the proposals submitted by AEP, FirstEnergy, Duke, and DP&L, these reply comments address the following proposed modifications:

- Limiting net metering compensation to electrical energy (and thus excluding demand and capacity);
- Reducing the size of a microturbine eligible for net metering;
- Reducing the cap on the amount of electricity a customer generator can place onto grid to 100% of a customer’s total usage requirements;

- Narrowing the locations that are eligible for a net metering system.

As discussed further in detail in these comments, many of the EDU proposals seem to be designed simply to erect barriers to distributed generation, and otherwise stifle the development of distributed generation in Ohio. As discussed below, the Commission should reject these proposals, which are contrary to the policy of the State of Ohio, and would frustrate distributed generation development by reducing the compensation available to customer generators and reducing the amount of facilities eligible to participate in net metering.

II. COMMENTS

It is the policy of the state of Ohio to encourage the development of distributed generation resources.¹ The General Assembly envisioned that net metering rules would, in part, be used to encourage that development.² Thus, the Commission should ensure that any net metering rules it adopts facilitates development of distributed generation resources. If the Commission, however, accepts the modifications discussed below, the Commission will fail in meeting its objective.

Currently, the penetration of distributed generation in Ohio is extremely low. Since 2009, for example, Ohio has certified only 132 megawatts of solar facilities—and only 25 megawatts of that amount was built in the past two years. Moreover, the

¹ R.C. 4928.02(C),(F), and (K).

² R.C. 4928.02(K) “Encourage implementation of distributed generation across customer classes through regular review and updating of administrative rules governing critical issues such as, but not limited to, interconnection standards, standby charges, and **net metering**.” (emphasis added).

amounts identified above are inflated by utility scale projects that are completely unrelated to net metering and customer investment.³

Ohio Solar by Year (MW)	
2009	13.4085
2010	6.7349
2011	22.3024
2012	29.8351
2013	36.2817
2014	9.3133
2015	14.6229
Total	132.4988

Figure 1: Source: <http://www.puco.ohio.gov/puco/index.cfm/industry-information/industry-topics/ohioe28099s-renewable-and-advanced-energy-portfolio-standard/#sthash.KOdZ02wY.4QEix2Md.dpbs>

In the 12 months period ending in October 2015, the electricity generated by distributed solar resources in Ohio was only 0.06% of retail sales.⁴ The below chart compares the penetration of distributed solar generation as a percentage of retail sales in Ohio with Pennsylvania and Maryland – two nearby states that rank 13th and 12th respectively in cumulative installed solar nationally. Maryland has almost 8 times more penetration and Pennsylvania almost 3 times more. Clearly there is still room for the Commission to encourage distributed generation vis-à-vis its statutory mandate to do so.

³ Indeed, 58 megawatts are comprised of projects of 1 mw or greater. Source: <http://www.puco.ohio.gov/puco/index.cfm/industry-information/industry-topics/ohioe28099s-renewable-and-advanced-energy-portfolio-standard/#sthash.KOdZ02wY.4QEix2Md.dpbs>

⁴ Solar Energy Industries Association, January 7, 2016

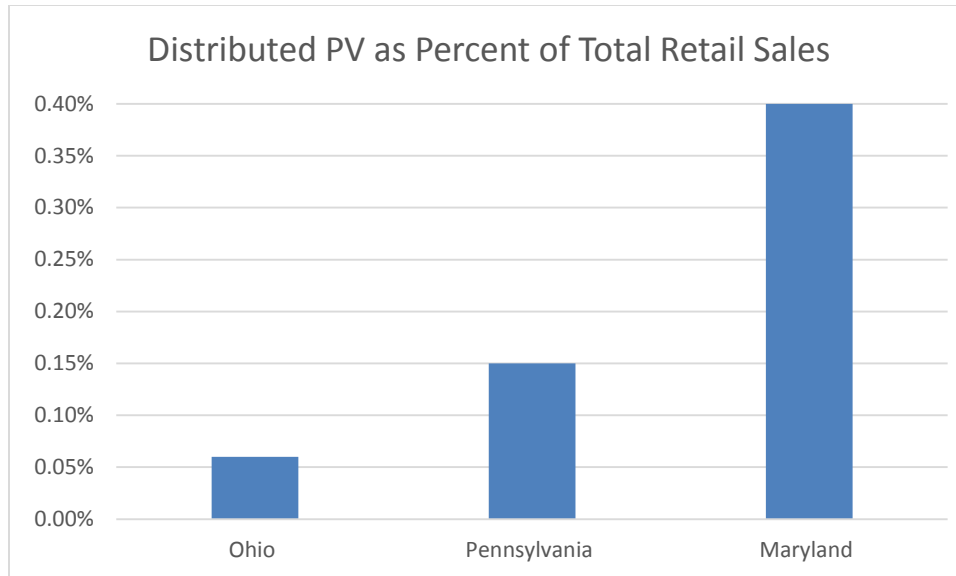


Figure 2: Source: Solar Energy Industries Association, January 7, 2016

Accordingly, IGS urges the Commission to reject the utility proposal discussed below, which would ensure that Ohio continues to lag behind its neighbors in distributed generation development.

A. Compensation should include capacity

AEP and FirstEnergy claim that the proposed rules Entry should be modified to exclude capacity compensation to customer generators. They argue that would violate *FirstEnergy Corp. v. Pub. Util. Comm.*, 95 Ohio St. 3d 401 (2002) as well as the Ohio Revised Code.⁵ The Commission should reject both of those arguments just as the Commission rejected them on two different earlier stages of this proceeding.

Specifically, in its May 28, 2014 Entry on Rehearing, the Commission stated:

Pursuant to the Supreme Court's holding in *FirstEnergy Corp.* and R.C. 4928.67(B)(1) and (2), *the refund for net excess generation must be for the electricity supplied and may not include distribution, transmission, ancillary services, transition, universal service fund, or energy efficiency*

⁵ FirstEnergy Comments at 9-11; AEP Comments at 3-9.

fund costs. FirstEnergy Corp. v. Pub. Util. Comm., 95 Ohio St.3d 401 (2002) at 405. *The Court pointed out that R.C. 4928.67 speaks in terms of electricity generated and supplied, which is generation service.* Included in generation service and the generation service rate are energy, demand, and capacity. The Commission has carefully considered its amendments and finds that using the SSO generation rate for calculating the monetary refund for customer-generators is consistent with the Revised Code and the Supreme Court's holding in *FirstEnergy Corp.*

Further, the Commission notes that energy, demand, and capacity are the components of electricity, which is indicated on customer bills as generation. Consistent with the Supreme Court's holding, the adopted rule for Ohio Adm.Code 4901:1-10-28(B)(9)(c) appropriately establishes a refund for net excess generation that compensates customer-generators for electricity generated and supplied to the EDU's distribution system, not just for the energy component of the generation. *While Ohio Power may contend that it does not receive capacity from the customer-generator, this is an oversimplification of the issue. In reality, the net metering customer-generator has offset their demand, which requires less capacity to be procured by the EDU for the area.* While Ohio Power may not receive a supply of capacity from the customer-generator, it has in actuality received a demand-side reduction in the amount of capacity that it must procure.

Additionally, the Commission believes that it would be impractical, if not impossible, for each EDU to accurately isolate just the energy price component from its full requirements SSO products and attribute it to the electricity generated by a customer-generator. Ohio Power has not demonstrated to us that it would be practical, or even possible, to attribute an energy price to the electricity generated by a customer-generator. Further, Ohio Power has not demonstrated that it is not being adequately compensated for its capacity obligation, as it receives capacity revenues from SSO customers through an established state compensation mechanism. See *In re Commission Review of the Capacity Charges of Ohio Power*, 10-2929-EL-UNC Opinion and Order July 2, 2012) at 33. Accordingly, rehearing on the assignment of error raised by Ohio Power Company is denied.⁶

Following FirstEnergy's attempt to take a second bite at the capacity component of the rule, the Commission affirmed its prior holding on July 23, 2014, stating:

[E]ven if FirstEnergy's application for rehearing was not procedurally improper, the Commission would still deny rehearing on the Companies' assignment of error because FirstEnergy has presented an unreasonable reading of R.C. 4928.67, which would prevent the Commission from furthering the policies of the state of Ohio enumerated in R.C. 4928.02.

⁶ Entry at 20-21 (May 28, 2014) (emphasis added).

FirstEnergy makes multiple arguments in support of its single assignment of error that the Commission's Second Entry on Rehearing is unlawful or unreasonable because the Commission's interpretation of Ohio Adm.Code 4901:1-10- 28(B)(9)(c) requires the EDUs to issue a monetary credit for excess generation in a manner that violates the Revised Code and *FirstEnergy Corp. v. Pub. Util. Comm.*, 95 Ohio St.3d 401 (2002). We will address these arguments below individually.

FirstEnergy first argues that the Commission's interpretation of the word "electricity" in Ohio Adm.Code 4901:1-10-28(B)(9)(c) is inconsistent with the plain language of R.C. 4928.01 (A)(31). According to FirstEnergy, R.C. 4928.01(A)(31) indicates that a net metering facility is a facility for the production of electrical energy, not for the production of electricity. Therefore, according to FirstEnergy, a customer-generator is permitted by law to only provide electrical energy to an EDU because a net metering system may only produce electrical energy. FirstEnergy then asserts that the subsequent use of the term "electricity" in R.C. 4928.67 must be interpreted to mean "electrical energy," to be consistent with R.C. 4928.01(31). Further, FirstEnergy argues that the Commission's interpretation of "electricity" to include all of the components of electricity creates a conflict between R.C. 4928.01 and 4928.67. Specifically, FirstEnergy argues that the Commission's interpretation rewrites the statute to include the words "demand" and "capacity" into the definition of net metering system in R.C. 4928.01(31). FirstEnergy asserts that the General Assembly's use of the term "electrical energy" signals then intent for a net metering system to provide just the energy component of electricity to the EDU. Therefore, FirstEnergy asserts that the rate paid to customer-generators should include only the energy component of electricity.

The Commission agrees with IGS that electricity supplied to a customer generator includes components such as capacity, demand, and energy; therefore, the electricity generated by the customer-generator should also be recognized to include the components of capacity, demand, and energy. As the Supreme Court of Ohio has noted, "the net-generator provisions . . . speak solely in terms of electricity generated and supplied, as they should. A net-generator customer of FirstEnergy only generates and supplies electricity; it does not provide transmission, distribution, or ancillary services." *FirstEnergy Corp. V. Pub. Util. Comm.*, 95 Ohio St.3d 401 (2002). Therefore, by using the SSO rate for the credit to customer-generators, we have provided a full and complete rate, exclusive of transmission, distribution, or ancillary services, to be applied to the electricity generated and supplied by the customer generator.

We find no merit to FirstEnergy's argument that the Commission's interpretation of "electricity" in Ohio Adm.Code 4901:1-10-28(B)(9)(c) is inconsistent with the definition of "net metering system" set forth in R.C.

4928.01(31). The Commission notes that the definition of "net metering" in R.C. 4928.01(30) states that net metering means measuring the difference in an applicable billing period between the electricity supplied by an electric service provider and the electricity generated by a customer-generator that is fed back to the electric service provider. This definition is consistent with the use of "electricity" in R.C. 4928.67, which also speaks in terms of electricity supplied and electricity generated.

We also disagree with FirstEnergy's assertion that the statutory references in R.C. 4928.67 to the term electricity actually mean electrical energy. We note that FirstEnergy's arguments are internally inconsistent, as FirstEnergy argues that the General Assembly knew exactly what it meant when it used the term electrical energy in R.C. 4928.01(31), but that it did not know what it meant when it used the term electricity throughout R.C. 4928.67, 4928.01(30), and 4928.01(31).

We find, as we did in our Order, that the EDUs should credit customer-generators for electricity at the SSO rate, which has energy, demand, and capacity components built into it. We agree with IGS that this determination is consistent with R.C. 4928.67(A)(1), which requires that the contract or tariff for net metering must be identical in rate structure, all retail rate components, and any monthly charges to the contract or tariff to which the same customer would be assigned if that customer were not a customer-generator. The SSO rate is the generation rate authorized by the Commission pursuant to R.C. 4928.141 for the EDUs to provide the competitive retail electric services necessary to maintain essential electric service to consumers. The electric services necessary to maintain electric service to customers includes energy, capacity, and demand. By using the SSO rate, the Commission ensures that customer-generators are credited for all of the components of electricity that they provide to the distribution system and only for the components of electricity that they provide to the distribution system. Additionally, by using the SSO rate, the Commission ensures that customer-generators are credited for providing electricity without requiring that a demand meter be installed.

We find no merit to FirstEnergy's argument that the Commission's Second Entry on Rehearing nullifies the Ohio Supreme Court's holding in *FirstEnergy Corp. v. Pub. Util. Comm.*, 95 Ohio St.3d 401 (2002). The single issue in that case was whether the Commission acted unlawfully or unreasonably in ordering FirstEnergy to modify a proposed net-energy metering rider (August Rider) that FirstEnergy argued was consistent with R.C. Chapter 4928 and the Commission's rules. The Ohio Supreme Court held that the Commission acted unlawfully or unreasonably in ordering modifications to FirstEnergy's August Rider when the proposed rider was already in compliance with the R.C. Chapter 4928 and the Ohio

Administrative Code. Further, the Court provided direction on how the rules could have been drafted to violate the Revised Code; specifically, the Court indicated that the rules should not require the EDUs to pay customer-generators for distribution or transmission service. The Ohio Supreme Court then remanded the case to the Commission with instructions for the Commission to approve the August Rider without modification. *FirstEnergy Corp. v. Pub. Util. Comm.*, 95 Ohio St.3d 401 (2002) at ¶19.

We find no merit to the argument proposed by FirstEnergy that the only way the rules can comply with the Ohio Supreme Court's holding is to provide an energy-only credit for excess generation. We recognize that customer-generators do not provide a distribution or transmission service to the EDUs, as the Court indicated; therefore, we did not adopt a rule requiring that customer-generators be compensated for distribution or transmission service. *FirstEnergy Corp. v. Pub. Util. Comm.*, 95 Ohio St.3d 401 (2002). Under the newly adopted Ohio Adm.Code 4901:1-10-28(B)(9)(c), customer generators will still pay distribution and transmission charges, as well as other nonbypassable charges, in compliance with the Revised Code and the Ohio Supreme Court's holding in *FirstEnergy Corp.* Under the newly adopted Ohio Adm.Code 4901:1-10-28, customer-generators will still be billed for distribution and transmission service, and will still pay their share of non-bypassable riders, even if their credit for excess generation is applied to their total bill pursuant to R.C. 4928.67(B)(1)(b).⁷

Despite the Commission's well-reasoned prior Entries, FirstEnergy and AEP *again* ask the Commission to limit net metering compensation to the energy portion of the SSO rate. The Commission has already addressed their arguments at length; the Commission should not indulge AEP and FirstEnergy further, especially given that they have entered into stipulations that require them to remove barriers to developing distributed generation.⁸

⁷ Entry at 3-8 (July 23, 2014).

⁸ *In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider*, Case Nos. 14-1693-EL-RDR, *et al.*, Stipulation and Recommendation at 29 (Dec. 14, 2015); *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO, Stipulation and Recommendation at 9 (Dec. 1, 2015).

B. The Commission should not reduce the size of a micro turbine eligible for net metering

FirstEnergy recommends that the Commission reduce the proposed 2 megawatt definition of micro turbine to a combustion turbine of a threshold size of 500 kw or smaller.⁹ FirstEnergy claims that its proposed definition is supported by the language of R.C. 4928.01(A)(31), that allegedly distinguishes between a microturbine and “other types of combustion turbines.” FirstEnergy further claims that industry standards support its proposed size reduction, though it fails to identify any standard limiting a microturbine to smaller than 250 kilowatts. IGS recommends that the Commission reject FirstEnergy’s proposed modification.

Initially, FirstEnergy incorrectly asserts that the language of R.C. 4928.01(A)(31) supports its proposed limited definition of microturbine. That section contains the *only* reference to microturbine in all of the Revised Code:

“Net metering system” means a facility for the production of electrical energy that does all of the following:

- (a) Uses as its fuel either solar, wind, biomass, landfill gas, or hydropower, or uses a microturbine or a fuel cell.

Thus, microturbine is not specifically defined. Given the General Assembly did not specifically codify the definition of microturbine, the Commission has wide latitude to rely upon its own expertise, judgment, and state policy to define it in its own rules. Because state policy favors the use of net metering to facilitate the development of distributed generation resources, it is reasonable and appropriate to adopt an expansive definition of microturbine.

C. The 120% cap is appropriate and should be expanded for resources that are coupled with battery technology

⁹ FirstEnergy Comments at 2-3.

Each of the electric distribution utilities recommend that the Commission modify the proposed rules to require that a customer-generator not size their facilities to produce more than 100% of their total energy usage.¹⁰ Duke further recommends that the limitation apply to both the customer's energy and capacity requirements. Finally, Duke and DP&L recommend that the Commission limit residential customer generation facilities to 10 kw. The Commission should reject these modifications for several reasons.

Many distributed generation resources, such as solar, produce varying levels of generation output depending on weather conditions. Thus, it may be appropriate to construct a distributed generation resource that is slightly larger than a customer's total usage requirements to ensure it satisfies its intended purpose of offsetting customer usage in all types of weather.

Sizing distributed generation facilities larger than total customer usage may also enable the coupling of solar with battery technology. In so doing, a customer may reduce the necessity to take electricity from the grid in all hours regardless of the intermittency of the distributed generation resource technology the customer selects. This type of efficient customer investment would reduce the total capacity and energy requirements of the grid and benefit all customers in the form of lower wholesale prices and avoided distribution infrastructure investment costs. While this practice is not yet widespread, further technological advancement is expected in the near term. The Commission should adopt forward thinking net metering rules that enable innovation rather than waiting until the next five year review. Indeed, the Commission should

¹⁰ DP&L at 3-5; Duke Comments at 2-3; FirstEnergy Comments at 6-8; AEP Comments at 12-17.

consider allowing customers to size distributed generation larger than 120% of their total usage when such facilities are coupled with battery technology. Such innovative technological synergies clearly fit within the statutory net metering criteria because they are “intended primarily to offset part or all of the customer-generator's requirements for electricity.”¹¹

Moreover, allowing a customer to size a distributed generation resource to be slightly larger than the total usage requirements allows a customer to account for potential future growth. It would be inefficient or potentially impossible for a customer to add on to their distributed generation resource in a piecemeal fashion only after their usage increases.

Duke provides no evidence to support its claim that it would threaten the integrity of the distribution system to allow customers to construct facilities greater than 100% of their usage or peak demand. Duke's assertion is unreasonable on its face. A customer's peak demand may change from year to year depending on a number of different factors such as economic conditions. It is not unusual for a customer's peak demand to increase or decrease by 20%. Given that the distribution grid has historically maintained reliability at times when it is necessary to deliver additional electricity to a customer above and beyond historical usage requirements, there is no reason why the grid cannot maintain reliability when the customer produces power back onto the grid in a similar volume.

Finally, there is no reason to limit the size of residential customer distributed generation resources to 10 kw. Duke provides no evidentiary support for its proposed

¹¹ R.C. 4928.01(A)(31)(d).

size limitation. IGS believes that it should be rejected, given that industry participants are currently constructing residential facilities above the size without experiencing reliability consequences.

Given the current low level of distributed generation penetration in Ohio there is no legitimate reason to consider lowering size caps for distributed generation technology. At a minimum the Commission should wait until there is much greater penetration of distributed generation, before it takes action to reduce the size of distributed generation projects.

D. The Commission should allow customers to construct distributed generation on contiguous property

FirstEnergy and DP&L oppose the proposed rule defining a customers' premises. FirstEnergy alleges the Staff's proposed definition would potentially result in customers violating Ohio law regarding exclusive distribution service territories and extending their own distribution lines across highways.¹² FirstEnergy proposes that the Commission delete the last sentence from the proposed rule, which reads "For purposes of this rule, an area is considered a contiguous lot regardless of easements, public thoroughfares, transportation rights-of-way, or utility rights-of-way."¹³ IGS recommends that the Commission reject FirstEnergy's proposed modification, which is overly restrictive.

The proposed rule as drafted recognizes that property laws are complicated and generation siting is a complex process. And the mere fact that a distributed generation facility is located on contiguous property connected by an easement should not automatically disqualify the facility from participating in net metering. Of course, if an

¹² DP&L Comments at 2; FirstEnergy Comments at 3-4.

¹³ FirstEnergy Comments at 4.

individual project cannot be constructed safely, the electric distribution utility can identify that risk during the interconnection process. The net metering rules would not change that fact.

III. CONCLUSION

For the reasons discussed herein, IGS recommends that the Commission reject the proposals submitted by FirstEnergy, Duke, DP&L, and AEP and adopt the recommendations submitted by IGS in its Initial Comments.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing *Reply Comments of IGS Solar, LLC, IGS Generation, LLC, and Interstate Gas Supply, Inc.* upon the following parties via electric transmission, this 8th day of January, 2016.

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