

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	)	
Review of Chapters 4901:5-1, 4901:5-3,	)	
4901:5-5 and 4901:5-7 of the Ohio	)	Case No. 15-0053-GE-ORD
Administrative Code, Regarding Gas and	)	
Electric Forecasting Rules.	)	

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**COMMENTS  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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**I. INTRODUCTION**

The Office of the Ohio Consumers' Counsel ("OCC") files these Comments where the administrative rules governing long-term forecasting reporting requirements for gas and electric utilities, electric transmission owners, and natural gas and electric distribution companies are under review. The rules under review list requirements for the contents of annual, long-term forecasting reports and fee instructions for gas and electric utilities, electric transmission owners, and natural gas and electric distribution companies. The reports provide an analysis of load forecasts, the resource plans to meet the load, and a description of how the forecasts were calculated. Modifications proposed and adopted in this proceeding may affect the information available about long-term plans for Ohio natural gas and electric utility customers.

The Public Utilities Commission of Ohio ("PUCO" or "the Commission") invited interested persons to file comments and reply comments concerning proposed changes to the gas and electric forecasting rules contained in Ohio Adm. Code Chapters 4901:5-

1,4901:5-3,4901:5-5, and 4901:5-7.<sup>1</sup> OCC has authority under law to represent the interests of Ohio residential natural gas and electric utility customers, pursuant to R.C. Chapter 4911.OCC is filing on behalf of all Ohio residential natural gas and electric utility customers.<sup>2</sup>

## **II. COMMENTS**

### **A. Forecast report requirements for electric utilities and transmission owners**

Ohio Admin. Code 4901:5-5-03 provides the forecasting requirements for electric utilities and transmission owners. OCC recommends that language be added to this rule that requires each of Ohio's Electric Distribution Utilities to report the amount of customer-owned distributed generation on its system. It is important to establish a baseline on this resource (or demand offset) so that Ohio can assess potential impacts of legislative or rate design changes targeting distributed generation. This information is maintained by the utilities in their interconnection agreement databases. In this regard, OCC recommends inserting the following language after 4901:5-5-03(C)(4):

(5) EACH UTILITY WILL PROVIDE A TABLE CONTAINING THE TOTAL AMOUNT OF DISTRIBUTED GENERATION CAPACITY IN MEGAWATTS, BY FUEL TYPE, IN THEIR SERVICE TERRITORY THAT HAVE INTERCONNECTION AGREEMENTS.

## **III. CONCLUSION**

OCC appreciates the opportunity to provide these initial comments regarding the proposed changes to the gas and electric forecasting rules on behalf of Ohio consumers.

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<sup>1</sup> Case No. 15-0053-GE-ORD, Entry at 1 (November 18, 2015).

<sup>2</sup> OCC's proposed language is shown in ALL CAPS and underlined.

Respectfully submitted,

BRUCE J. WESTON (0016973)  
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/s/ Kyle L. Kern

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Comments have been served via electronic service upon the following parties of record this 1<sup>st</sup> day of February, 2016.

/s/ Kyle L. Kern  
Kyle L. Kern  
Assistant Consumers' Counsel

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Summary: Comments Comments by the Office of the Ohio Consumers Counsel. electronically filed by Ms. Jamie Williams on behalf of Kern, Kyle L. Mrs.