

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of)
Duke Energy Ohio, Inc. for approval of)
An Interconnection Tariff pursuant to the)
Rules contained in Chapter 4901:1-22,)
Ohio Administrative Code)**

Case No. 15-1669-EL-ATA

Staff Findings and Recommendations

I. Statutory Background

On December 4, 2013, the Public Utilities Commission of Ohio (PUCO) adopted amended rules for electric generator interconnection service and standards, in accordance with Ohio Revised Code (R.C.) 4928.06, R.C. 4928.11(A) and the State of Ohio's 5-year rule review procedures. The amended rules, which are contained within Ohio Administrative Code (Ohio Adm.Code) 4901:1-22, subsequently became effective on July 10, 2014.

Specifically, R.C. 4928.11(A) provides:

For the protection of consumers in this state, the public utilities commission shall adopt rules under division (A) of section 4928.06 of the Revised Code that specify minimum service quality, safety, and reliability requirements for noncompetitive retail electric services supplied by an electric utility in this state, to the extent such authority is not preempted by federal law. The rules shall include prescriptive standards for inspection, maintenance, repair, and replacement of the transmission and distribution systems of electric utilities; shall apply to each substantial type of transmission or distribution equipment or facility; shall establish uniform interconnection standards to ensure transmission and distribution system safety and reliability and shall otherwise provide for high quality, safe, and reliable electric service; shall include standards for operation, reliability, and safety during periods of emergency and disaster; and shall include voltage standards for efficient operation of single-phase motors. The rules

regarding interconnection shall seek to prevent barriers to new technology and shall not make compliance unduly burdensome or expensive. When questions arise about specific equipment to meet interconnection standards, the commission shall initiate proceedings open to the public to solicit comments from all interested parties. Additionally, rules under this division shall include nondiscriminatory metering standards.

According to Ohio Adm.Code 4901:1-22-02(B), the interconnection service tariff filing requirement of each PUCO-regulated electric distribution utility (EDU) in the State of Ohio is as follows:

Ohio Adm.Code 4901:1-22-02(B), provides:

Each EDU in the state of Ohio shall file uniform interconnection service tariffs for commission review and approval pursuant to division (A) of section 4928.11 of the Revised Code that includes the procedures and technical requirements set forth in this chapter for interconnection service on a first-come, first-served basis.

The findings and recommendations in this document pertain to the interconnection service tariff that has been filed by Duke Energy Ohio, Inc. (Duke Energy Ohio or Company), in response to the amended rules.

II. Company Filing Summarized

Duke Energy Ohio filed an application to modify its interconnection service tariff on September 24, 2015. The Company included a red-line of its current tariff and a clean version of the proposed tariff in its filing.

The Company filed a cover letter and revised interconnection tariff on January 29, 2016 and February 01, 2016 respectively, following discussions with PUCO Staff (Staff) about its September 24, 2015 tariff filing.

III. Filed Comments

No persons filed comments in this proceeding.

IV. Staff Findings

Following its review of Duke Energy Ohio's proposed interconnection service tariff and any timely comments submitted in this proceeding, Staff makes the following findings:

- (1) Duke Energy Ohio is an EDU in Ohio, and therefore the Company had a tariff filing obligation in response to the amended Ohio interconnection service rules.
- (2) The Company initially filed its interconnection tariff on September 24, 2015. Following subsequent communications with Staff regarding the original filing, the Company filed a revised tariff on February 01, 2016.
- (3) Following a review of the revised tariff, Staff confirmed that the Company has satisfied its interconnection service tariff filing requirement.
- (4) The cover letter¹ for the revised tariff indicates that the Company has added language in its internal technical document, which clarifies to customers that all distributed generation interconnections within the Company's service territory are subject to the interconnection tariff and Ohio's interconnection rules contained within Ohio Adm.Code 4901:1-22.

V. Staff Recommendations

Following its review of the information submitted in this proceeding and other relevant data, Staff recommends the following:

- (1) Duke Energy Ohio has satisfied its interconnection service tariff filing requirement.
- (2) As discussed in its cover letter for the revised tariff, the Company will provide a link or reference in its technical document to direct customers to the current interconnection tariff.

¹ Case No. 15-1669-EL-ATA, Company filing dated January 29, 2016, Letter submitted by Ms. Elizabeth H. Watts.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/10/2016 4:32:20 PM

in

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Summary: Staff Review and Recommendation electronically filed by Ms. Mahila Christopher
on behalf of PUCO Staff