

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the PowerForward)
Distribution System Planning Workgroup.) Case No. 18-1596-EL-GRD

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

I. INTRODUCTION

On November 14, 2018, the Commission issued an entry soliciting comments on the current-state assessment report (“Report”) recommended in PowerForward: A Roadmap to Ohio’s Electricity Future (“PowerForward Roadmap”). In the Report, each electric distribution utility (“EDU”) will provide their distribution systems’ present capability to integrate and accommodate the broad array of EDU and non-EDU initiatives that are likely to occur. Interstate Gas Supply, Inc. and IGS Solar, LLC (collectively “IGS”) appreciates the opportunity to provide comments on the content of the Report.

II. COMMENTS

IGS supports the Commission requiring EDUs to provide an assessment of their current distribution systems. Although all of the requested information will be very beneficial as innovation continues to drive a more decentralized grid, IGS would like to specifically emphasize the importance of transparency in Hosting Capacity Analyses (“HCA”) and the general distribution planning process, given that these analyses are somewhat interlinked.

A. Distribution Planning Process

An EDU's distribution infrastructure planning process requires the thoughtful consideration of a multitude of variables. IGS would like to emphasize the growing importance of transparency in those variables as innovation drives us to a more decentralized grid. For example, an overview of the distribution planning process will be helpful, but analysis into how each circuit is planned within that process will provide the greatest understanding of the system's present capabilities. Additionally, more insight into planning assumptions will allow the Commission to easily compare and contrast the assumptions made by the EDUs to ensure they are using the best, most accurate methods.

For example, the EDUs should identify whether each circuit is planned based upon the coincident circuit peak, non-coincident peak, or some other metric. Further, the EDUs should identify whether their planning considers growth rates and to what extent such rates are considered. More visibility into the planning process will provide the Commission more opportunities for uniformity.

B. HCA

IGS appreciates the Commission's recognition of HCA as a key part of the integrated distribution system planning process. A properly designed HCA provides an estimate of the amount of distributed energy resources ("DERs") that can be accommodated without significant upgrades, or, conversely, areas of the grid under stress that may benefit from non-wires alternatives.

In the Report, the EDUs will propose use cases, methodology, and implementation timelines for HCA.¹ To receive the greatest benefit from the Report, IGS recommends “methodology” should encompass both the proposed method for calculating available capacity and the proposed method for presenting that available capacity. Including the formula for calculating available capacity will provide the inputs and sensitivities considered by each EDU, while the proposed method for sharing this information will provide what data the EDU intends to share and in what format.

Requiring the EDUs to provide this information is an imperative first step to achieving the Commission’s stated goal of a uniform platform across all service territories. Providing more detailed proposals up front will expose stakeholders to all of the considerations that go into developing and utilizing HCA. Now more easily identified, these considerations can then guide the Distribution System Planning Workgroup to the recommendations necessary to the Commission.² Further, better informed participants will produce a more engaged, collaborative environment, which the Commission recognizes as crucial to the integrated distribution planning process.³ Ultimately, discussing the underlying components of HCA on a thoughtful, detailed level will result the construction of the most uniform HCA systems.

III. CONCLUSION

For the foregoing reasons, IGS recommends that the Commission direct the EDUs to provide transparency into their distribution system planning, including specifying that

¹ *PowerForward Roadmap* at 18-19.

² See *PowerForward Roadmap* at 19; Entry (Nov. 28, 2018) at ¶ 5.

³ *PowerForward Roadmap* at 19.

the EDUs should include in their HCA proposals the methodology for calculating available capacity and the methodology for presenting that available capacity.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that *Comments of Interstate Gas Supply, Inc. and IGS Solar, LLC* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 4th of December 2018. The PUCO's e-filing system will electronically serve notice of the filing of this document on the parties of record.

/s/ Bethany Allen
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Summary: Comments Comments of Interstate Gas Supply, Inc. and IGS Solar, LLC
electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc. and IGS Solar,
LLC