

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the PowerForward
Collaborative.

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)

Case No. 18-1595-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 grid architecture status report (“Report”) recommended in PowerForward: A Roadmap to Ohio’s Electricity Future (“PowerForward Roadmap”). In the Report, each electric distribution utility (“EDU”) will provide its progress on the core components of the essential architecture needed to advance the modern grid. Interstate Gas Supply, Inc. and IGS Solar, LLC (“IGS” or “IGS Energy”) appreciates the opportunity to provide comments on the Report.

II. COMMENTS

IGS applauds the Commission’s recognition that standardized access to customer energy usage data (“CEUD”) for CRES providers and other third parties should be viewed as a fundamental and core component of the platform.¹ Without providing access to this data, Ohio will be unable to achieve the policy objectives outlined in the PowerForward

¹ *PowerForward Roadmap* at 16, 31.

Roadmap. Therefore, IGS recommends the Report include certain provisions regarding the status of the EDU's CEUD capabilities.

First, IGS suggests each EDU should be required to identify how they currently provide access to usage data to CRES providers in their territory, what frequency the data is provided, and the granularity of that data. Additionally, IGS recommends each EDU should address whether CEUD is currently used to calculate CRES providers' wholesale settlement statements for purposes of establishing energy and capacity obligations.

Notably, the Data and the Modern Grid Workgroup ("DWG") is tasked with prescribing a uniform methodology to provide access to CEUD to CRES providers and other third parties, including the data necessary to calculate individual wholesale market settlements.² Recently, the Commission issued a request for proposal for an outside technical consultant to facilitate the creation of this methodology.³ Equipping the consultant and stakeholders participating in the DWG with baseline information about the EDUs' current data access capabilities will breed efficient and effective discussions. All participants will not only work from the same foundational knowledge of the current systems but will also better understand the steps needed to get to the uniformity the Commission envisions.

² *In re PowerForward Data and Modern Grid Workgroup*, Case No. 18-1597-EL-GRD, Entry (Nov. 28, 2018) at ¶ 5.

³ *Id.* at 6.

III. CONCLUSION

Therefore, IGS recommends that the Commission specify the EDUs are required to provide their current data access and use capabilities.

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

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 IGS Solar, LLC and Interstate Gas Supply,
Inc.