

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Review)
of Chapter 4901:1-22, Ohio) Case No. 18-884-EL-ORD
Administrative Code, Regarding)
Interconnection Services.

**COMMENTS OF
THE DAYTON POWER AND LIGHT COMPANY**

The Dayton Power and Light Company (“DP&L” or “the Company”) appreciates the opportunity to provide comments in response to the Entry dated January 29, 2020 in which the Public Utilities Commission of Ohio (“Commission” or “PUCO”) solicited interested parties’ comments on proposed changes relating to Chapter 4901:1-22 OAC regarding Interconnection Services. The Commission solicited general comments on the general questions as set forth in the entry itself, as well as invited feedback on the proposed changes to the text of the existing rules. DP&L’s comments with respect to policy questions and rule changes in connection with Interconnection Services are set forth below.

DP&L Responses to the Commission’s General Questions:

- a) Staff has specifically drawn on IEEE Std. 1547-2018 in several definitions within the rules without fully adopting the standard due to compatibility lag between IEEE and Underwriters’ Laboratories standards. What is the best method for adopting IEEE 1547-2018 in Ohio?

DP&L believes that the best method for adopting IEEE Std. 1547-2018 (Std. 1547-2018) in Ohio is to require applicants to abide by all standards set forth in Std. 1547-2018. This method would be the most efficient manner to fully acclimate Ohio to Std. 1547-2018.

- b)** Relatedly, at the September 11, 2018 workshop, PJM Interconnection LLC (PJM) emphasized the importance of the ride-through requirements and encouraged the Commission to specifically adopt IEEE 1547-2018 and its ride through provisions during this five-year review. Do stakeholders believe that the IEEE 1547-2018 ride-through provisions must be incorporated into Ohio Adm.Code Chapter 4901:1-22 at this time? If so, which category of ride-through requirements should be adopted in these rules and why?

DP&L believes that the ride-through provisions should be incorporated into Chapter 4901:1-22 OAC at this time. This allows Ohio utilities to be prepared in the event we see a large amount of DERs in the future. DP&L would agree to support PJM's ride-through recommendations to improve the reliability of the interconnected grid and to promote standardization of the stakeholders.

- c)** PJM also encouraged the Commission to use this rule review proceeding to provide clarity regarding whether a request for interconnection is subject to Ohio or PJM jurisdiction. Is such clarification necessary at this time?

At this time, DP&L's understanding is that any DER interconnection that intends to participate in the PJM wholesale market would need to go through the PJM interconnection process. If a resource intends to be designated as a capacity resource or energy resource it must go through the PJM process; otherwise, the DER interconnection would be within the State of Ohio's jurisdiction.

- d)** With respect to Ohio Adm.Code 4901:1-22-03, are there any additional standards and codes that have become relevant to the interconnection and interoperability of DERs?

At this time, DP&L is not recommending any additional standards or codes that are relevant to the interconnection and interoperability of DERs.

- e)** During the workshop, two stakeholder groups expressed concerns about engineering challenges posed by DER interconnection within the state. Do these interconnection rules make technical sense from an engineering perspective? Do the rules strike an adequate balance between encouraging the state-wide proliferation of DER while maintaining safety and reliability of the distribution system on a local level? If not, how should the rules be changed and why?

As of the date of these Comments, DP&L has not experienced any engineering issues that would necessitate a change to the interconnection rules.

- f) Are the generation and capacity limits included in the level 1 and level 2 approval criteria still appropriate? Are EDUs denying applications for level 1 or level 2 interconnection based on applicants exceeding these limits?

As of the date of these Comments, DP&L has not had to deny level 1 or level 2 interconnections based on the applicants exceeding generation and capacity limits.

Therefore, at this time, DP&L has no reason to believe that the approval criteria are inappropriate.

- g) Please provide feedback with regard to the efficacy of the administrative procedures and processes set forth in the rules with regard to creating a uniform experience for consumers throughout the state. For example, is the application process adequately standardized? Are applications being processed in a reasonably timely manner considering the complexity of review and necessity for various screens and studies, or are there unreasonable delays to achieving a fully operational status? Are costs adequately addressed?

DP&L can only speak for its own experience, but as of the date of these Comments, the Company has been able to process interconnection applications in a reasonably timely manner and with adequate compensation under the current code provisions. This could change, however, if future interconnection applications become more frequent and/or complex due to DER proliferation. While DP&L appreciates the efforts to standardize the interconnection application process, it realizes that there is no standard number of applications an EDU might receive nor is there a standard for how each EDU should dedicate resources to the interconnection application process. As a result, DP&L questions whether a uniform experience is truly obtainable for all consumers. To illustrate, one EDU may receive significantly more applications than the others and, as a result, its applicants may experience more delay than the

applicants at another EDU. Similarly, if an EDU utilizes a web-based and/or automated solution to assist in its applications processing, its applicants might experience less delay than applicants at another EDU that is using a manual process. In both examples, the consumer experience can vary greatly. Therefore, as a general matter, DP&L would welcome opportunities for individualized process standards to be presented by the EDU for approval by the Commission. Alternatively, DP&L would be supportive of further discussions to see whether a truly uniform experience is obtainable across all EDUs with the Commission's assistance.

- h)** Finally, given that the rules are technically nuanced, should the Commission form a working group including various stakeholders to aid in the continued development of these rules, both now and through future review?

It would be beneficial to continue to study and develop the impacts and challenges of DERs in Ohio. As we see more growth in DERs, DP&L could envision a need to review, or revise, and/or clarify the rules in the future, potentially at a frequency greater than which rules are otherwise reviewed and/or modified. DP&L welcomes the opportunity to participate in such a working group.

Proposed Amendments

4901:1-22-05(A) Application Forms:

In order to explore the potential benefits of technology in the interconnection application review process, or to record and track additional information that is otherwise important to the company, it might be necessary for EDUs to use application forms which vary from those proposed by the Commission. For example, an EDU may wish to use an electronic form on a website for applicants to complete online or it may wish to ask additional questions not currently being asked. For these reasons, DP&L requests that

the rules be amended to afford EDUs some flexibility to seek and receive Commission approval to vary from the standard form. Therefore, DP&L proposes the following edit to OAC 4901:1-22-05 (A)(2) –

“The application form shall follow the format and content set forth on the ~~Ce~~ommission's website, or in a format otherwise approved by the Ceommission, and must be submitted to the EDU from which the applicant receives retail electric distribution service...”

4901:1-22-05 (B): DER Equipment:

While DP&L is generally supportive of standardization of DER equipment requirements, preferences for disconnect switch locations might vary between EDUs. To that end, DP&L proposes the following additions to the already-modified text of OAC 4901:1-22-05(B)(1)(c)(ii):

“(ii) ~~If the~~ The disconnect switch ~~is~~ must be external to the equipment package, it must be accessible to and lockable by EDU personnel, within an acceptable distance of the meter as determined by the EDU, at either the primary voltage level, which may include load-break cutouts, switches, and elbows, or at the secondary voltage level, which may include a secondary breaker or switch.”

Finally, DP&L proposes to expand 4901:1-22-05(B)(1)(d) to include all DER installations, not just solar equipment.

4901:1-22-07 (C) – Level 2 Review Timeframe:

While DP&L is generally supportive of standardization of review criteria and timeframes, each EDU may require some degree of local discretion to require additional analysis before approving an application that otherwise meets the stated criteria.

Therefore, DP&L proposes that modified text of OAC 4901:1-22-07 (C)(4) be adjusted to read:

“ ~~If~~ Regardless if the proposed interconnection ~~fails to meet~~ meets the screening criteria, ~~and if~~ the EDU determines that minor modifications or further study ~~may~~ be are required to interconnect the proposed ~~distributed generation facility~~ DER to

the EDU's ~~distribution~~ system consistent with safety, reliability, and power quality standards, the EDU shall...”

4901:1-22-07, 4901:1-22-08, and 4901:1-22-09 – Levels 1, 2, and 3 Approval Criteria:

Beyond all of the technical considerations in the approval process, another issue that EDUs face when reviewing an interconnection application is determining whether the applicant is authorized to request interconnection or to sign an interconnection agreement. For an EDU to make an informed decision on either of these questions, the data provided on the application must match the following EDU account records: the applicant being the account’s customer of record, the DER location being the same as the account’s service address, that the account number be active and its numbers and/or letters be listed accurately, and, in the event there are two or more accounts for the same location, that the correct account be included on the application.

To illustrate, if an EDU were to receive an application where the applicant’s name is not associated with the applicable EDU account, the application must be rejected. Similarly, if an EDU were to receive an application that provides a location which does not match the service location for the EDU account listed, it is DP&L’s belief that such application must also be rejected. Therefore, DP&L requests that such criteria be added to the applicable approval criteria sections for each of the Level 1, 2, and 3 applications.

Respectfully submitted,

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Summary: Comments of the Dayton Power and Light Company electronically filed by Mr. Robert J Adams on behalf of The Dayton Power and Light Company