

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

REPLY COMMENTS OF OHIO POWER COMPANY

INTRODUCTION

Pursuant to Public Utilities Commission of Ohio's ("Commission") Entry filed January 29, 2020 ("Entry"), Ohio Power Company ("AEP Ohio" or the "Company") respectfully submits these reply comments regarding the responses to the questions posed by the Commission and the proposed changes to Ohio Adm.Code 4901:1-22 (the "Rules").

REPLY COMMENTS

A. Ohio Adm.Code 4901:1-22-01

AEP Ohio agrees with Duke Energy Ohio, Inc.'s ("Duke Energy") comments opposing the proposed deletions of "Area network" and "Spot network" from Ohio Adm. Code 4901:1-22-01(C) and (BB).¹ In its initial comments, AEP Ohio attempted to address the issues identified by Duke Energy associated with implementing the new definitions for "EPS", "Area EPS", and "Local EPS" in sections 22-06(B)(1)(d) and 22-07(E).² However, AEP Ohio agrees with Duke Energy that retaining the Area network and Spot network definitions is the most technically appropriate way to distinguish underground and non-underground network design considerations when taking into account the DER interconnection system impact. As such, the Company agrees

¹ Duke Energy Initial Comments at 4-5.

² AEP Ohio Initial Comments at 4.

that the Commission should retain the definitions of Area network and Spot network and encourages the Commission to retain those terms as they currently appear and apply in Ohio Adm.Code 4901:1-22-06(B)(1)(d) and 4901:1-22-07(B)(1)(k) and (E)(1).

B. The Current Level 3 Interconnection Process is Appropriate.

AEP Ohio disagrees with One Energy Enterprises LLC's ("One Energy") assertion that the level 3 process is "broken."³ Specifically, One Energy claims that no interconnection study should take longer than 60 days but would be in favor of a 90-day timeline.⁴ The Company understands One Energy's desire to have a standardized review timeline; however, as the Company stated in its initial comments, the current interconnection rules, including the level 3 review process, strike the appropriate balance between encouraging state-wide proliferation of DER while maintaining safety and reliability of the system.⁵

Although the review of some level 3 applications takes longer than for others, it is important to give an electric distribution utility ("EDU") adequate time to consider all the impacts a proposed interconnection will have on the EDU's system. Level 3 interconnection requests present complex engineering and reliability considerations that the Company must work through before approving the application, making compliance with the proposed 60- or 90-day requirement in every instance impractical. Requiring an EDU to complete its review within 60 or 90 days would hinder the EDU's ability to fully consider and address the impacts the interconnection would have on its system, thereby placing the reliability and safety of the system at risk. Thus, eliminating the flexibility in the current Rules would potentially require the Company to approve applications without fully considering the reliability and safety impacts to

³ One Energy Initial Comments at 4.

⁴ Id. at 5.

⁵ AEP Ohio Initial Comments at 7.

its system, or to deny applications until such a time the Company has the ability to fully consider such impacts. Such a requirement would be detrimental to the Company's other customers, interconnectors, and the grid.

This concern is further exacerbated by the potential increase in interconnection requests. As the use of DERs becomes more prevalent in Ohio, the number of level 3 interconnection requests will increase commensurately. The increase in applications will make complying with the proposed 60- or 90-day requirement even more impractical and further increase the reliability and safety risks to the system. As such, the Commission should reject One Energy's proposal because the current Rules adequately balance proliferation of DER and the safety and reliability of the grid, One Energy's proposal prioritizes the proliferation of DER over the safety and reliability of the system and compliance with such requirement will be impractical, especially with increases in the use of DER in Ohio.

The Company has and will continue to review all level 3 applications in the most timely and efficient manner based the complexity, uniqueness, and volume of applications in the Company's queue.

C. The Current Cost Allocation for DER Interconnection is Appropriate.

AEP Ohio opposes Ohio Manufacturers' Association Energy Group's ("OMAEG") proposal to require EDUs or the Commission to perform a system benefits analysis to determine the costs that will be allocated to the interconnector and the EDU respectively.⁶ AEP Ohio further opposes OMAEG suggestion to incorporate the interconnection process in the Company's Non-Wires Alternative process.⁷ First, to the extent OMAEG seeks to have costs allocated to the EDU for upgrades that benefit the distribution system, the Company does not

⁶ OMAEG Initial Comments at 3.

⁷ Id.

charge those costs to the interconnector. The Company only charges interconnectors the costs required to interconnect their DER to the grid; any work that would otherwise be performed by the Company to upgrade the system is not charged to the interconnector, even if the performance of such work is accelerated by the interconnection request. Thus, there is no need to make a change to the Rules and/or require additional analysis to accomplish OMAEG's desired result.

Further, the Company does not believe that the system benefits analysis used for new load would provide the information necessary to appropriately allocate the costs of upgrades that benefit the system associated with interconnecting DERs. Specifically, the system benefit analysis used for new load would not properly account for the intermittent use of DERs and the impacts the intermittent resource would have on the system. As such, given that there is no agreed upon analysis for properly determining the benefits of DERs to the EDUs system and allocating costs accordingly, the Commission should reject such proposal.

Finally, the Company does not believe that the process of interconnecting DERs should be incorporated with the Company's Non-Wires Alternative process. The Non-Wires Alternative process was approved as a pilot program to allow the EDUs to collect data, determine the appropriate policies and procedures, and analyze the benefits, or lack thereof, for implementing the Non-Wires Alternative process. Requiring EDUs to incorporate the interconnection rules and process into this pilot program would hinder the EDUs ability to analyze the impacts of the Non-Wires Alternatives process. Therefore, it is not appropriate to incorporate the interconnection process with the Non-Wires Alternative as part of the Commission's review.

For the foregoing reasons, the Commission should not adopt OMAEG's proposal to amend the Rules to require EDUs or the Commission to perform a system benefits analysis to

determine how the cost of an interconnection request will be allocated or incorporating the interconnection process in the Company's Non-Wires Alternative process.

D. The Current Dispute Resolution Process is Adequate.

Finally, One Energy's and the Office of the Ohio Consumers' Counsel's ("OCC") proposals to ostensibly increase Commission oversight over disputes that may arise between an interconnector and an EDU are unnecessary.⁸ The current complaint process is adequate to address disputes between an EDU and an applicant.

First, One Energy proposes a process by which a party can request Commission oversight or mediation of a dispute related to an interconnection request.⁹ However, the Rules already contemplate such a process. Pursuant to Ohio Adm.Code 4901-9-01(G), should an interconnection dispute arise, and an applicant file a complaint with the Commission, the Commission has oversight over the dispute and the complaint will be set for a settlement conference to be conducted pursuant to the Uniform Mediation Act. Thus, to the extent One Energy seeks Commission oversight over dispute and meditation of such claims, the Rules already provide what One Energy requests. Implementing an additional step in this process would only increase the burden on the EDUs and Staff and, therefore, the Commission should reject One Energy's proposal.

Further, although it does not propose any specific language, OCC recommends changes to Ohio Adm.Code 4901:1-22-12 to require a utility to disclose to the Commission and OCC all instances in which a consumer contacts the utility regarding a complaint or other dispute related to interconnection, even if such complaint does not become a formal complaint.¹⁰ Given that

⁸ One Energy Initial Comments at 7-8; OCC Initial Comments at 5.

⁹ One Energy Initial Comments at 7.

¹⁰ OCC Initial Comments at 5.

OCC does not define “complaint” or “dispute,” this proposal would seem to require the utility to notify the Commission and OCC each time an application is denied for failing to meet any interconnection criterion, any time the Company must conduct a supplemental review of the application or, potentially, even if there is error in the application that requires further coordination between the parties. OCC’s proposal is vague and compliance with such a requirement would be entirely impractical. Further, this proposal provides no benefits to customers and seeks only to increase the burden on the EDUs and Staff. Finally, as stated above, to the extent that a dispute or complaint requires Commission oversight, the formal complaint process adequately provides for such oversight, with visibility to OCC. Thus, the Commission should reject OCC’s proposal because OCC’s concerns are adequately contemplated and provided for in the current Rules, the proposed requirement is vague and otherwise impractical to comply with, and the proposal provides no benefits to customers while significantly increasing the burdens on the utilities and Staff.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 3rd day of April, 2020. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

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Summary: Comments - Reply Comments submitted by Ohio Power Company electronically filed by Tanner Wolfram on behalf of Ohio Power Company