

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for Certification)	
As an Ohio Renewable Energy Resource Generation)	Case No. 20-1638-EL-REN
Facility for the Lakota Wind Project)	

**REVIEW AND RECOMMENDATION
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

CASE HISTORY

On October 21, 2020, a representative submitted an application on behalf of the Iowa Lakes Electric Cooperative (Applicant) for certification of the Lakota Wind Project (Facility).¹ The representative also supplemented the application with a PJM Distribution Factor Analysis (DFAX).

The Facility is located in Lakota, Iowa. Comprised of seven GE wind turbines, the aggregate capacity of the Facility is 10.5 megawatts. According to the application, the Facility was placed into service in March 2009.

An Attorney Examiner Entry issued on November 2, 2020, suspended the automatic approval process for this case.

On November 5, 2020, Staff sent the Applicant questions related to the Facility. The Applicant provided responses later the next day.

STAFF REVIEW

The Staff's consideration of applications for certification of a renewable energy resource facility consists primarily, but not exclusively, of three statutory criteria: (1) the deliverability of the

¹ The Applicant submitted its application on October 21st, and Staff initiated a case to consider the application on the Commission's Docketing Information System on October 26th.

facility's output to the state of Ohio, (2) the resource/technology used at the facility, and (3) the facility's placed in-service date.

1) Deliverability

Under R.C. 4928.64(B)(3), a qualifying renewable energy resource must either have a facility located in Ohio, or be deliverable into Ohio. Further, Ohio Administrative Code (Ohio Adm.Code) 4901:1-40-01(F) defines "deliverable into this state" as follows:

"Deliverable into this state" means that the electricity or qualifying biologically derived methane gas originates from a facility within a state contiguous to Ohio. It may also include electricity originating from other locations, pending a demonstration that the electricity is physically deliverable to the state.

Because the Facility is a grid-connected facility located in Iowa, a state not contiguous to Ohio, Staff concludes that the Applicant would need to provide sufficient documentation to demonstrate physical deliverability to Ohio consistent with the approach established in Case No. 09-0555-EL-REN. In 09-0555-EL-REN, the Commission accepted the Staff's proposed approach requiring that the absolute value of a facility's impact on a transmission line in Ohio must be greater than 5 percent and greater than 1 megawatt (MW), as determined by an adequate power flow study.

The Applicant provided a DFAX power flow study which was performed in August 2020 by PJM Interconnection, LLC. The DFAX analysis assumed a 50/50 peak load forecast for the 2025 Regional Transmission Expansion Plan Summer Case. The DFAX study evaluated the impacts of power flows from the Facility's injection of energy on approximately 3,000 bulk electric system transmission facilities in Ohio and the surrounding areas.

The highest DFAX value (**10.47%**) within the state of Ohio occurred on American Electric Power's Maliszewski-Vassel 765 kilovolt transmission line. This value meets the greater than five percent transmission line impact criterion.

Multiplying the highest DFAX value by the Facility's nameplate capacity results in a value of **1.0996 MWs**, which satisfies the greater than 1 MW criterion.²

As the Facility satisfies both the 5 percent and 1 MW criteria, Staff concludes that the Facility is physically deliverable to the state of Ohio.

² 0.10472 * 10.5 = 1.0996 MW

2) Resource/Technology

The R.C. defines “renewable energy resource” for purposes of the state’s renewable portfolio standard (RPS).³ This statutory definition of a renewable energy resource includes wind power, and therefore Staff concludes that the Facility satisfies the resource/technology provision of the statute.

3) Placed In-Service Date

The Facility must satisfy one of the applicable statutory provisions pertaining to the placed in-service date.⁴ With all of the Facility’s wind turbines having been placed in-service after January 1, 1998, Staff finds that the Facility satisfies the applicable placed in-service date requirement.

4) Additional Considerations

- (a) For electric generating facilities, Commission rules require that facilities above 6 kilowatts measure their renewable output with a utility-grade meter.⁵ The meter described in the application satisfies this rule requirement.
- (b) The Facility must be registered with either M-RETS or PJM EIS’ GATS, the two attribute tracking systems currently recognized by the Commission. The Applicant indicated that the Facility is currently registered with M-RETS, a fact confirmed by Staff.⁶

STAFF RECOMMENDATION

Staff has completed its review of the application and any supplemental information provided by the Applicant. Staff has determined that the Facility appears to satisfy the Commission’s requirements for certification as a renewable energy facility. Staff recommends that the Facility be certified.

³ R.C. 4928.01(A)(37)

⁴ R.C. 4928.64(A)(1)

⁵ Ohio Adm.Code 4901:1-40-04(C)(2)(e).

⁶ The Facility has the M-RETS ID number of M554.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/2/2020 2:19:41 PM

in

Case No(s). 20-1638-EL-REN

Summary: Staff Review and Recommendation electronically filed by Mr. Stuart M Siegfried on behalf of PUCO Staff